

From: [Jonathan Rivera \(He/Him/His\)](#)
To: [WILLIAM KIRKLAND](#)
Cc: [Binoy Desai](#); [Bob Kellner](#); [Jose Diaz](#)
Subject: Summer RP inspection document request.
Date: Monday, August 19, 2024 12:42:10 PM
Attachments: [Summer 2024-04 RP Information Request.pdf](#)

Hank,

As we discussed last week here is the separate document request for our upcoming RP inspection in September and October 2024. Reach out to me if you have any questions.

Thanks,
Jonathan

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V.C. Summer Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2024-004

During the weeks of **September 23 – 27, 2024** and **October 7 – 11, 2024** the NRC will perform a baseline Radiation Safety Inspection at V.C. Summer Nuclear Plant (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 September 19, 2024.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Jonathan Rivera at 404-997-4646, 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>.

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Document Request List

Inspection Dates: **September 23 – 27, 2024 and October 7 – 11, 2024**

Documents Due to Region II by: September 19, 2024

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 71124.06 - Radioactive Gaseous and Liquid Effluent Treatment
- IP 71124.07 - Radiological Environmental Monitoring Program (REMP)
- IP 71151 - Performance Indicator Verification (Occupational Cornerstone)

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Note: The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. 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)

71124.01 - Radiological Hazard Assessment and Exposure Controls (Last inspected April 2023)

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. Schedule of work in HRAs or other radiologically significant work during the weeks of inspection
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 refueling outage
7. 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 April 1, 2023

71124.03 – In-Plant Airborne Radioactivity Control and Mitigation

(Last inspected June 2022)

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
6. The last 2 in-place filter testing surveillances of the HEPA/charcoal banks for the Main Control Room emergency air filtration system.
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 June 1, 2022

71124.04 – Occupational Dose Assessment

(Last inspected June 2022)

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, QC for whole body counter, 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 met the following criteria since June 1, 2022:
 - CEDE > 10 mrem
 - TEDE > 1 rem
 - SDE > 500 mrem
 - Neutron dose > 100 mrem
 - Level 3 PCEs
4. List of all personnel contamination events identified since June 1, 2022
5. Most recent alpha source term plant characterization
6. Area TLD results for general plant areas (not REMP TLDs), going back two years.
7. Copies of current WBC libraries (e.g. routine, medical, investigative, etc.)
8. Most recent audit or self-assessment of the dosimetry program
9. List of CRs generated since June 1, 2022 for internal or external dosimetry issues/events

71124.05 - Radiation Monitoring Instrumentation

(Last inspected June 2022)

1. Procedures/Guidance Documents 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) RM-L5 Liquid Radwaste Effluent Monitor
 - b) RM-A4 and RM-A14, Reactor Building Purge Monitor (including High Range)
 - c) RM-L8, Turbine Building Sump Monitor
 - e) RM-G7 Reactor Building High Range Area Monitor
 - f) RM-G1 Main Control Room Area Monitor
 - g) RM-A3 and RM-A13, Main Plant Vent Monitor (including High Range)
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 in-place filter testing surveillances for the HEPA/charcoal banks of the reactor building purge discharge pathway
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 June 1, 2022 related to portable instruments, area monitors, effluent monitors, CAMs, RCA release point monitors, WBCs, and count room instruments

71151 - Performance Indicator Verification (Occupational Radiation Safety Cornerstone)

(Last inspected April 2023)

1. Site, Corporate, and radiation protection specific procedure(s) for identifying, reporting, tracking, and correcting performance indicator (PI) occurrences.
2. List of all CAP documents related to occupational radiological controls using search keywords such as HRA, LHRA, VHRA, unintended dose, unlocked door, ALARA, since April 1, 2023
3. List of electronic dosimeter alarms since April 1, 2023 (dose and dose rate)