From:	Bob Kellner
To:	Stacy, Kara M.; Dixon, Jim R. (Vogtle RP)
Subject:	Vogtle 3&4 NRC Radiation Safety Inspection - October 2024
Date:	Tuesday, September 3, 2024 12:54:00 PM
Attachments:	Vogtle 3 and 4 2024-004 Radiation Safety Inspection Initial Information Request.pdf

Kara,

Thank you for confirming that you will be the Licensing POC for the upcoming Radiation Safety Inspection at Vogtle 3&4 starting in October 2024.

Attached is the initial information requested for the inspection. The request includes a list of the documents we routinely request for Inspection Procedures (IPs) 71124.01, 71124.03, 71124.04, 71124.05, and 71151. 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. If you intend to utilize your SharePoint file sharing portal, please provide detailed information regarding account setup, login instructions, etc. since several members of inspection team may not have used the portal before.

The current plan is to be onsite the weeks of October 21-25 and November 4-8, 2024. As of now, Jack Bell, Darrell Neal, David Restrepo, and I will be the inspectors coming onsite. Jack and I should still be badged at Vogtle 3&4 but I don't know about Darrell and David.

Please let me know if you have any questions.

Regards,

Bob

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Vogtle Electric Generating Plant - Units 3 and 4
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2024004

During the weeks of October 21 - 25 and November 4 - 8, 2024, the NRC will perform a baseline Radiation Safety Inspection at Vogtle Units 3 & 4 (NRC Inspection Procedures (IP) 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. 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 October 10, 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 30 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

Occupational and Public Radiation Safety Cornerstones

Inspection Dates:	October 21 - 25 and November 4 - 8, 2024	
Documents Due to Region II by:	October 10, 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 71151	Performance Indicator Verification

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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 **August 1, 2023,** to present for IPs 71124.01 and IP 71124.05, from **March 1, 2023,** to present for IP 71124.03, IP 71124.04, and from **July 1, 2023,** to present for IP 71151. 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 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. Corrective Action Program (CAP) procedure(s)
4. List of site and corporate radiation protection procedures, including title and number
5. Most recent 10 CFR 61 analysis for the DAW waste stream
6. Outage schedule, including work activities to be conducted during the weeks of the inspection (e.g. Gantt chart or similar list)

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

1. Site and corporate procedures related to RP controls (e.g., Posting, labeling, surveys, survey frequency, RWPs, contamination control, HRA/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, ISFSI Controls, etc.)
2. Site and corporate procedures related to release of personnel and materials (e.g., release surveys, decontamination, guidance for alarm follow-up, etc.)
3. List of planned outage & active online Radiation Work Permits (RWPs), including dose and dose rate limits/alarms.
4. List of locations, or plant maps, indicating the location, of LHRAs and VHRAs. Include areas with the potential to become a LHRA during routine operations or outages.
5. List of all non-fuel items stored in the spent fuel pool (e.g., used filters, irradiated hardware, etc.).
6. Technical basis documents (white paper, engineering calculation, etc.) related to the facility beta-gamma and alpha radiation characterization.
7. ALARA planning packages for the 5 highest dose jobs for the upcoming refueling outage.
8. All self-assessments or audits covering radiological hazard assessment and exposure controls and HP controls since August 1, 2023 (if none, then provide the two most recent).
9. List of Corrective Action Program (CAP) documents (CR, NRC, AR, etc.) related to RP controls (e.g., radworker error, HP technician error, posting issues, Nationally Tracked Sources issue, HRA/LHRA/VHRA issues, survey problems, ALARA, etc.) generated since August 1, 2023. *This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.*

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation
(Not previously inspected – Unit 3 initial criticality March 7, 2023, Unit 4 February 14, 2024)

1. Site and corporate 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. Site and corporate procedures related to the control and use of respiratory protection devices, (e.g., SCBA, TEDE-ALARA guidance, PAPRs, storage, maintenance, training, QA, fit-testing, etc.)
3. Copy of the last 2 grade D air testing certificates for each supplied air system and SCBA filling station
4. Documentation of the last 2 surveillances performed on SCBAs available for emergency use, and negative pressure respirators designated as ‘”in storage” but available for use.
5. Two most recent surveillances that verify the flow rates for the following ventilation systems:
   a) Unit 4 Auxiliary Building Exhaust
   b) Unit 3 Plant Vent Stack
   c) Unit 4 Radwaste Building Exhaust
6. Two most recent HEPA filter DOP and charcoal test results for the following ventilation systems:
   a) Unit 4 Main Control Room (MCR) Supply Air
   b) Unit 3 Containment Air Filtration Exhaust
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 March 1, 2023. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
9. Available for onsite review during inspection

a) Inventory, inspection and maintenance records of radiological respiratory protection devices and SCBA equipment used for emergency response
b) Training records, including fit tests, for SCBA qualified individuals
c) List of all licensed operators qualified to wear an SCBA
d) List of site ERO personnel qualified to wear an SCBA
e) List of all RP personnel qualified to wear an SCBA
f) Training/qualification certificates for all onsite and/or vendor personnel qualified to repair SCBAs that performed maintenance or repairs from March 1, 2023, to present.

71124.04 - Occupational Dose Assessment

(Not previously inspected – Unit 3 initial criticality March 7, 2023, Unit 4 February 14, 2024)

1. Site and corporate 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. NVLAP accreditation documentation for CY 2023, and the current year for worker dosimetry used by the site.
3. List of all positive whole-body counts, in vitro, or air sampling analyses which resulted in a CEDE equal to or exceeding 10 millirem since March 1, 2023. [*Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection*]
4. List of all personnel contamination events identified since March 1, 2023. [*Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection.*]
5. Copy of the most recent neutron characterization
6. Copy of the most recent alpha characterization
7. Copy of the most recent beta and gamma characterization
8. Last 18 months of area TLD results for general plant areas (not REMP TLDs)
9. Copies of current WBC libraries (e.g., routine, medical, investigative, etc.)
10. Copy of the current whole body counter calibration.
11. Most recent audit or self-assessment of the dosimetry program and/or the most recent audit of the lab that processes site dosimetry
12. List of CRs generated since March 1, 2023, for internal or external dosimetry issues/events. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71124.05 - Radiation Monitoring Instrumentation

(Last inspected August 2023)

1. Site and corporate Radiation Protection, chemistry, and maintenance procedures/guidance documents, as applicable, for the following:
   a) Calibration and functional test/source checks of portable radiation detection instruments
   b) Calibration and functional tests of small article monitor, personnel contamination monitor, portal monitor, counting room equipment, electronic alarming dosimeters, whole body counting equipment, and continuous air monitors
   c) Collection and analysis of high-range, post-accident effluent samples
   d) Determination of set-points for area radiation monitor, CAM, PCM, PM, and SAM equipment used for area and personnel monitoring equipment

e) QA program (inter-laboratory comparison program) for count room instruments

2. The last 2 calibration records for each of the following instruments:
   a) Unit 4 Containment High Range Radiation Monitors (CHRRMS) (4PXS-JE-RE160, 161, 162, and 163)
   b) Unit 3 Turbine Building Vent Discharge Radiation Monitors (3TDS-JE-RE001A/B)
   c) Unit 3 Containment Air Filtration Exhaust Radiation Monitor (3VFS-JE-RE001)
   d) Unit 4 Liquid Radwaste Discharge Monitor (4WLS-JE-RE229)
   e) Unit 4 Plant Vent Radiation Monitor (4VFS-JE-RE101, RE102, and RE103) [Normal-Range, particulate, iodine, and noble gas Effluent Monitor]
   f) Unit 4 Plant Vent Radiation Monitor (4VFS-JE-RE104A/RE104B) [Mid and High Range noble gas Effluent Monitor]
3. Documentation showing traceability to NIST, and to the primary calibration, for the radioactive sources used to calibrate the instruments in item 2 above.
4. Chart or procedure listing EALs associated with radiation monitors
5. Emergency plan documents identifying which radiation monitors are used to determine emergency action levels (EALs).
6. Provide a current list of in service (available for use) SAMs, PCMs, PMs, air samplers, continuous air monitors (CAMs), portable radiation detection instruments, counting room (RP and Chemistry), and Whole-Body Counters. *[Note: The list will be used to select monitors for evaluation during the onsite inspection*.)
7. Most recent test record of the instrument calibrator (e.g., Shepherd or Hopewell validation testing/dose rate curves).
8. Design documents and/or calculations showing how the alarm setpoints for the following instruments are determined:
   a) PCMs and PMs at the RCA and Protected Area exit points
   b) CAMs
9. Results of the counting room and whole-body counter Inter-Laboratory Comparison Program for 2023 and thus far in 2024.
10. Most recent Radiation Monitoring System engineering performance review/evaluation or system health report, if applicable.
11. Most recent audit or self-assessment covering RP instruments (portables, RCA exit point, WBC, count room). Include any reviews conducted of vendor facilities, as applicable.
12. List of CAP documents (CR, NRC, AR, etc.) related to portable instruments, area monitors, CAMs, RCA release point monitors, WBCs, and count room instruments generated since August 1, 2023. *This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.*

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

1. Site, Corporate, and radiation protection specific procedure(s) for identifying, reporting, tracking, and correcting performance indicator (PI) occurrences.
2. Monthly PI reports since July 1, 2023, and copies of associated condition reports for any Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual (RETS/ODCM) Radiological Effluent occurrences.
3. List of all CAP documents related to effluent dose/ODCM issues using search keywords such as RETS/ODCM, abnormal or unmonitored release, offsite dose, and effluent release, etc. since July 1, 2023. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
4. List of all CAP documents related to occupational radiological controls using search

keywords such as HRA, LHRA, VHRA, unintended dose, unlocked door, ALARA, since July 1, 2023. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

5. Most recent gaseous and liquid effluent evaluation of dose to the public (year-to-date doses).
6. List of electronic dosimeter alarms since July 1, 2023 (dose and dose rate).

Assistance Requested During On-Site Inspection

- Identification of radiological work activities available during the inspection week for observation, including notification of pre-job briefings, notification of risk significant work activities, and location of audio/visual surveillance for remote job coverage.
- Health physics assistance in coordinating observation of radiological job coverage activities and performing plant walk-downs.
- Identification of any installed radiation monitoring calibration activities planned that may be available for inspector observation during the inspection.

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