INSPECTION PROCEDURE 71125 ATTACHMENT 02

# RADIOLOGICAL PERFORMANCE - REMOTE INSPECTION

Effective Date: July 1, 2026

PROGRAM APPLICABILITY: IMC 2515 A

CORNERSTONES: Occupational and Public Radiation Safety

INSPECTION BASES: See IMC 0308 Attachment 2

SAMPLE REQUIREMENTS:

| Sample Requirements | | Minimum Baseline Sample Completion Requirements | | Budgeted Range | |
|---|---|---|---|---|---|
| Sample Type | Section(s) | Frequency | Sample Size | Samples | Hours |
| Source Term Characterization | 03.01 | Triennial | 1 per site | 1 per site | 36-40 per site |
| Internal Dosimetry | 03.02 | Triennial* | 1 per site | 1-2 per site | |
| Special Dosimetric Situations | 03.03 | Triennial* | 1 per site | 1-2 per site | |
| Radioactive Effluent Sampling and Analysis | 03.04 | Triennial | 1 per site | 1 per site | |
| Dose Calculations | 03.05 | Triennial | 1 per site | 1-3 per site | |
| Abnormal Discharges | 03.06 | Triennial* | 1 per site | 1-3 per site | |
| Radiological Environmental Monitoring Program | 03.07 | Triennial | 1 per site | 1 per site | |
| GPI Verification | 03.08 | Triennial | 1 per site | 1 per site | |
| Waste Characterization and Classification | 03.09 | Triennial | 1 per site | 1 per site | |

* When appropriately risk-informed samples are not available for inspection follow completion guidance of IMC 0306 section 06.08.f.3.

## 71125.02-01 INSPECTION OBJECTIVES

01.01 Verify the accuracy and effectiveness of the licensee's ability to characterize the radiological source term.

01.02 Verify that occupational dose is appropriately monitored.

01.03 To verify the gaseous and liquid effluent processing systems are maintained so that radiological discharges are properly mitigated, monitored, and evaluated with regard to public exposure.

01.04 To verify that abnormal radioactive gaseous or liquid discharges and conditions, when effluent radiation monitors are out-of-service, are controlled in accordance with applicable regulatory requirements and licensee procedures.

01.05 To verify the adequacy of public dose calculations and projections resulting from radioactive effluent discharges.

01.06 To verify that the REMP is implemented consistently with the licensee's technical specifications (TS) and/or offsite dose calculation manual (ODCM) and to validate that the radioactive effluent release program meets the design objectives reflected in the licensees radioactive effluent technical specifications.

01.07 To verify the licensee's continued implementation of the voluntary NEI/Industry Ground Water Protection Initiative (GPI).

01.08 To verify the effectiveness of the licensee's program for characterizing and classifying radioactive waste.

01.09 To conduct a routine review of problem identification and resolution activities per Inspection Procedure (IP) 71152, "Problem Identification and Resolution."

## 71125.02-02 GENERAL GUIDANCE

Review the results of radiation protection program audits related to internal and external dosimetry. The results of the reviews should be used to gain insights into overall licensee performance in the area of dose assessment and focus the inspector's activities consistent with the principle of "smart sampling." Consider reviewing documents such as licensee's quality assurance (QA) audits, self-assessments, or other independent audits.

Review the licensee procedures associated with dosimetry operations. Inspectors should consider 1) issuance/use of external dosimetry (routine, multibadging, extremity, neutron, etc.); 2) assessment of internal dose (operation of whole body counter, assignment of dose based on DAC-hours, urinalysis, etc.); and 3) evaluation of and dose assessment for radiological incidents (distributed contamination, hot particles, loss of dosimetry, etc.).

Review licensee procedures for determining when external and internal dosimetry is required. Unless there is a documented prospective evaluation that individual monitoring was not required (i.e., planned exposure or intakes would not meet any of the criteria in 10 CFR 20.1502(a) or (b)), the fact that monitoring was provided is considered de facto evidence that the licensee had previously determined the monitoring was required by 10 CFR 20.1502.

The following additional document reviews should be performed to support inspection planning and risk informed (smart) sample selection related to the licensee's effluent monitoring program

a. Event Reports and Effluent Report Reviews

   Ensure that docketed reports since the previous inspection are included in the current inspection (e.g., annual radioactive effluent release reports, special 30-day reports, supplemental monitoring reports, offsite dose calculation manual revisions). Consider scheduling this inspection soon after the annual radiological environmental report has been developed such that recent data can be compared between the effluent report and the environmental reports.

   1. Review the Annual Radiological Effluent Release Report(s) issued since the last inspection. Determine if the reports were submitted as required by the ODCM/Technical Specifications. Note any anomalous results, unexpected trends or abnormal releases identified by the licensee for further inspection to determine if they were evaluated, were entered in the corrective action program and were adequately resolved.

b. ODCM and FSAR Reviews

   1. Review any changes to FSAR descriptions of the radioactive effluent monitoring systems, treatment systems, and effluent flow paths to inform inspection sampling.

   2. Review changes to the ODCM made by the licensee since the last inspection. If differences are identified, review the technical basis or evaluations of the change during the onsite inspection, to determine whether they were technically justified.

      Changes to the ODCM are submitted to NRC, as required.

      Review changes against the guidance in the following documents, as applicable to the licensing basis:

      (a) NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors,"

      (b) NUREG-1302, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors,"

      (c) NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants,"

      (d) Regulatory Guide (RG) 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR 50, Appendix I,"

      (e) RG 1.21, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste,"

      (f) RG 4.1, "Radiological Environmental Monitoring for Nuclear Power Plants," and

(g) RG 4.15, “Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination)—Effluent Streams and the Environment.”

3. If applicable, evaluate the licensee’s management of non-radioactive systems that have become contaminated since the last inspection. Determine if any of the newly contaminated systems have an unmonitored effluent discharge path to the environment, whether any required ODCM revisions were made to incorporate these new pathways and whether the associated effluents were reported as required.

   Review any event reports, ODCM entries and 10 CFR 50.59 evaluations that have been performed for systems that have been identified as contaminated since the last inspection. Bulletin 80-10 provides guidance on contaminated systems not originally designed to be contaminated.

c. Procedures, Special Reports, and Other Documents

1. Review LERs, event reports and/or special reports related to the effluent program issued since the previous inspection. Identify any additional focus areas for the inspection based on the scope/breadth of problems described in these reports.

2. Review effluent program implementing procedures, particularly those associated with effluent sampling, effluent monitor set point determinations and dose calculations.

3. Review copies of licensee and third party (independent) evaluation reports of the effluent monitoring program since the last inspection for insights into the licensee’s program and to aid the inspector in selecting areas for review (smart sampling). Such reports include Quality Assurance (QA) reports and reports describing the results of the inter-comparison program with third party analytical laboratories.

Review the Annual Radiological Environmental Operating Reports (AREOR) and the results of any licensee assessments since the last inspection to enable verifying that the REMP was implemented in accordance with the TS and ODCM. Review the AREOR for changes to the ODCM with respect to environmental monitoring, commitments in terms of sampling locations, monitoring and measurement frequencies, land use census, inter-laboratory comparison program, and analysis of data.

Review the ODCM to identify locations of environmental monitoring stations.

Review the final safety analysis report (FSAR) for information regarding the environmental monitoring program and meteorological monitoring instrumentation.

Review quality assurance audit results of the program to assist in choosing inspection “smart samples.” If the licensee uses a vendor laboratory to analyze the REMP samples, review any audits and technical evaluations performed on the vendor’s program.

Review the annual effluent release report and the 10 CFR Part 61, “Licensing Requirements for Land Disposal of Radioactive Waste,” report, to determine if the licensee is sampling, as appropriate, for the predominant and dose-causing radionuclides likely to be released in effluents.

Per IP 71152, it is expected that routine reviews of PI&R activities should equate to approximately 10 to 15 percent of the resources estimated for the associated baseline cornerstone procedures, this is a general estimate only based on the overall effort expected to be expended in each strategic performance area. It is anticipated that the actual hours required to be expended may vary significantly from attachment to attachment, depending on the nature and complexity of the issues that arise at the particular facility. Overall, an effort should be made to remain within the 10 to 15 percent estimate on a strategic performance area basis. Inspection time spent assessing PI&R as part of the baseline procedure attachments should be charged to the corresponding baseline procedure.

## 71125.02-03 INSPECTION REQUIREMENTS

### 03.01 Source Term Characterization Sample

**Verify the licensee has adequately characterized the types and energies of radiation being monitored, to include the proper application of scaling factor techniques, when characterizing radioactive source terms.**

Specific Guidance

a. The licensee should know the following components and spectra of their source term(s) for 1) gamma (photon), 2) beta, 3) average beta energy, 4) hard-to-detect (HTD) nuclides, 5) alpha/transuranic, and 6) neutron. Knowledge of the radiation types and energies being monitored are critical to the correct selection and use of dosimeters.

   Additionally, the plant source term may have evolved over time from the various changes that licensees have made to their facilities and operations. Information Notice 2014-05 reminds licensees of their responsibility for ensuring that all applicable factors that may affect the accuracy of a dosimetry evaluation have been considered and accounted for, including the proper characterization of the monitored radiation fields.

b. Consider if scaling factors have been developed for use in scaling hard-to-detect radionuclide activity and alpha radionuclides in internal dose assessments. If applicable, review the licensee's 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste," analyses to determine appropriate scaling factors for HTD and alpha-emitting radionuclides.

### 03.02 Internal Dosimetry Sample

**Evaluate the adequacy of the licensee's internal dose assessments for actual internal exposures.**

Specific Guidance

a. Consider whether the affected personnel were properly monitored with calibrated equipment and if data were analyzed and internal exposures properly assessed in accordance with licensee procedures.

b. In Vivo Bioassay

   1. Review procedures for assessing internal dose that address methods for 1) determining if an individual is internally or externally contaminated; 2) whether the

contamination was ingested or inhaled; 3) the release of contaminated individuals; and 4) assignment of dose. A common method for determining the location of personnel contamination is identifying the contaminated area via a hand held frisker and identifying the zone where the beta contamination monitor alarms.

2. Prompt whole body counts (WBCs), as well as follow-up WBCs can be used to determine if residual contamination levels follow the retention functions in NUREG/CR-4484 inhalation or ingestion models. Contamination removal from skin may occur by showering and skin layer sluffing.

   If the licensee routinely uses whole body counting (WBC) to verify, or quantify, the intakes of radionuclides, consider if the frequency of such measurements is consistent with the biological half-life of the potential nuclides available for intake. Be especially mindful of instances following personnel entry into a high airborne radioactivity area, or following the use of respiratory protection equipment.

3. If the licensee uses a method other than whole body counting for screening intakes, consider if the minimum detectable activity (MDA) is adequate to determine the potential for internally deposited radionuclides sufficient to prompt additional investigation. Some licensees have procedures for the use of personnel contamination monitors in lieu of routine WBCs. Review licensee evaluations to determine if the passive monitoring can identify intakes exceeding the evaluation level defined in RG 8.9 of 2% of an annual limit on intake (ALI), or 100 mrem committed effective dose equivalent (CEDE). This review should include any potential HTD contribution to CEDE as this will not be detected by passive monitoring.

4. Consider if whole body counts provide sufficient counting time/low background to ensure appropriate sensitivity for the potential radionuclides of interest; if the appropriate nuclide library was used; and if any anomalous count peaks/nuclides indicated in each output spectra received appropriate disposition. WBC systems and gamma spectroscopy systems commonly have different radionuclide libraries for different exposure conditions and/or analytical needs. Selectively review the radionuclide libraries and consider if the licensee has analytical capabilities for fission products, natural occurring radioactive materials, and failed fuel conditions.

5. If the licensee relies solely on whole body counting for assessing internal dose, consider if HTD nuclides are accounted for in the dose assessment and review the licensee's methodology for determining HTD scaling factors.

c. In Vitro Bioassay

1. For licensees with an in vitro bioassay program, determine if procedures used to assess dose from internally deposited radionuclides address collection and storage of samples; whether the contamination was ingested or inhaled; evaluation of results (including HTDs); and assignment of dose.

   The licensee's sample collection procedures should ensure the following:

   (a) Collection and preservation of samples in a manner such that the loss of activity on the walls of the container is minimal and sample contamination is prevented,

(b) A sample of adequate size for each type of analysis requested, including adequate amounts to allow verification or additional analysis if needed,

(c) Containers that are free of external and internal contamination,

(d) Precautions to ensure the integrity of the container and prevent leakage from the container and/or cross-contamination of samples during the shipment and storage of samples, and

(e) Accurate and unambiguous identification of samples. In addition, the licensee should specify the required lower limits of detection (LLDs) and the reporting requirements, including standard error or confidence interval estimates, and alert the service laboratory of potentially "highly contaminated" samples, samples that may contain additives and/or preservatives, or samples that may contain extremely insoluble material.

2. Labs should participate in an analysis cross-check program and out-of-tolerance results should be evaluated and resolved appropriately.

d. Dose Assessments Based on Airborne Monitoring

1. Assess the adequacy of the licensee's program for dose assessments based on air sampling and derived air concentration (DAC)-hour monitoring.

2. Consider if flow rates and/or collection times for fixed head air samplers or lapel breathing zone air samplers are adequate to ensure that appropriate LLDs are obtained.

3. Review the adequacy of procedural guidance used to assess dose when, if using respiratory protection, the licensee applies protection factors.

4. For dose assessments performed using air sampling and DAC-hr monitoring, consider if the licensee's DAC calculations are representative of the actual airborne radionuclide mixture, including HTD radionuclides, as appropriate.

03.03 Special Dosimetric Situations Sample

**For the following special situations evaluate how the licensee monitors and assigns occupational doses: skin exposures, exposures to the lens of the eye, declared pregnant workers, application of effective dose equivalent for external exposure methodologies, and neutron exposures.**

Specific Guidance

a. For declared pregnant workers consider if the licensee informs the worker, as appropriate, of the risks of radiation exposure to the embryo/fetus; the regulatory aspects of voluntarily declaring a pregnancy; and the specific process for voluntarily declaring a pregnancy.

b. Dosimeter Placement and Assessment of Effective Dose Equivalent for External Exposures (EDEX)

1. Consider if the licensee has established criteria for determining when alternate monitoring techniques are to be implemented.

2. When available, review annual dose records of workers that used EDEX monitoring and routine monitoring during the annual period, and verify accurate dose values were assigned per NRC Form 5 requirements.

c. Shallow Dose Equivalent (SDE)

Consider if clear criteria were established for releasing personnel with imbedded radioactive particles.

Consider evaluating the licensee's methodolgoies for monitoring and/or calculating SDE. SDE is the dose averaged over the 10 square centimeters of skin receiving the highest exposure. This should combine contributions from distributed skin contamination, gamma contributions from clothing contamination (if significant), as well as Discrete Radioactive Particles (DRPs), into one dosimetric quantity. If licensees are keeping track of DRP dose separately from SDE, then they are not meeting the intent of the 2002 rule change to SDE evaluation.

03.04 Radioactive Effluent Sampling and Analyses Sample

**Verify representative samples are obtained and that, if applicable, compensatory sampling is done consistent with the ODCM.**

Specific Guidance

a. Evaluate sampling system configurations or situations that may impact representative sampling (e.g., media by-pass, humidity, line loss, heat trace, sample line flushing, vessel recirculation, composite samplers, etc.). Guidance for review of reasonableness and consistency of sample data is covered in RG 4.15, Rev. 1, Section C. 8. For those licensees committed to Rev. 2 of RG 4.15, guidance is included in Section C.7 for quality assurance, Section C.8 for verification and validation, and Section 10 for preventive and corrective action. In general, the licensee's program in this area should be sufficient to detect anomalous data indicative of potential deficiencies in sample collection or analysis. For example, if the licensee's sample line for a system (e.g., stack) has lost integrity resulting in non-representative samples, would the program provide a means of detecting the deficiency?

b. For inoperable effluent radiation monitors consider if compensatory sampling is performed consistent with the ODCM and that compensatory actions are appropriate.

03.05 Dose Calculations Sample

**Evaluate licensee calculations of doses resulting from effluent activities and confirm that projected doses to members of the public are within criteria reflected in radiological effluent technical specifications.**

Specific Guidance

a. Review radioactive liquid and gaseous waste discharge permits. Consider how the licensee is quantifying discharges and if projected doses to members of the public are accurate and calculated using methods described in the licensee's ODCM.

b. Consider if the licensee's method(s) used to determine source term isotopes included all applicable radionuclides within detectability standards. Review the current Part 61 analyses to ensure hard-to-detect radionuclides are included in the source term.

c. Review significant changes in reported dose values compared to the previous Annual Radiological Effluent Release Reports and evaluate the factors which may have resulted in the change. Consider dose values that change by a factor of 5. Factors that may result in changes to dose values include fuel integrity, recent changes in coolant chemistry, extended outage, or major decontamination efforts. Review the licensee's dose calculation methods. If any concerns arise, use available NRC computer codes (agreement should be within a factor of 2) to verify dose values, perform manual calculation, or review the licensee's dose calculation methods.

d. Review changes in the licensee's offsite dose calculations since the last inspection for consistency with ODCM methods and RG 1.109. Review meteorological dispersion and deposition factors used in the ODCM and effluent dose calculations to ensure appropriate factors are being used for public dose calculations. Consider if in-plant dilution factors and dilution factors applied beyond the point of discharge into unrestricted areas are appropriately used in dose calculations for liquid effluents.

e. Review the results of the latest Land Use Census for changes that may need to be factored into the dose calculations. Consider significant increases or decreases to population in the plant environs, changes in critical exposure pathways, the location of nearest member of the public, or critical receptor, etc.

03.06 Abnormal Discharges Sample

**Verify that abnormal gaseous and liquid discharges, which occurred since the last inspection, were evaluated for the impact to the public.**

Specific Guidance

No Guidance.

03.07 Radiological Environmental Monitoring Program Sample

**Verify that the radiological environmental monitoring program is being implemented consistent with the regulations and ODCM.**

Specific Guidance

a. Consider if the licensee has initiated sampling of appropriate media (e.g., ground and surface water, milk, vegetation, sediment, and soil) upon loss of a required sampling station.

b. As available, evaluate the licensee's actions in response to events that involved a missed sample, inoperable sampler, direct radiation monitoring equipment (e.g., TLD), or anomalous measurement.

   Review missed and or anomalous environmental samples to identify if they should be reported in the annual environmental monitoring report. Review the licensee's assessment of any positive sample results (i.e., licensed radioactive material detected above the lower limits of detection (LLDs). Review the associated radioactive effluent release data that was the source of the released material. Consider if the licensee has addressed any positive indications in the environmental monitoring samples and has adjusted the effluent monitoring program and dose modeling, as appropriate to ensure the accuracy of the models.

c. Review the licensee's assessment of any positive sample results (i.e., licensed radioactive material was detected above the LLDs).

d. Consider if records developed since the last inspection, that are important to decommissioning, are retained as required. Licensees should document significant contamination resulting from leaks and spills, as required by 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (g).

e. Review any significant changes made by the licensee to the ODCM and review technical justifications for any changed sampling locations. Consider whether the licensee performed the reviews required to ensure that the changes did not affect its ability to monitor the impacts of radioactive effluent releases on the environment.

   Changes may be made in response to changes to the land use census, long-term meteorological conditions (3-year average), or modifications to the sampler stations since the last inspection.

f. Consider if the appropriate detection sensitivities are used for counting samples to satisfy TS/ODCM required LLDs.

g. Review quality control charts for maintaining radiation measurement instrument status and actions taken for degrading detector performance. If the licensee uses a vendor laboratory to analyze REMP samples, consider if the vendor's quality control program, including inter-laboratory comparison programs, is adequate. If applicable, review the licensee's determination of any bias to the data and the overall effect on the REMP.

03.08 Groundwater Protection Initiative Implementation Sample

***Document incomplete or discontinued elements of the licensee's Groundwater Protection Initiative program*** **[C1].**

Specific Guidance

a. Compare the licensee's groundwater protection program to the most current revision of NEI 07-07 to which the licensee is committed.

b. Review implementation of the Groundwater Protection Initiative (GPI) to determine if the licensee has implemented its program as intended, and to identify any aspects of the program that are not being implemented. The NRC does not inspect performance of the GPI, instead the NRC uses this inspection sample to verify that licensees are implementing the GPI as described in SECY 11-0019 and associated CA Note ML12347A290.

c. Observations of incomplete of discontinued elements of the licensee's implementation of the GPI should be documented in accordance with IMC 0611.

03.09 Waste Characterization and Classification Sample

**Verify the licensee characterizes and classifies radioactive waste.**

Specific Guidance

a. Consider if the licensee correctly uses radiochemical analyses results to support radioactive waste characterization and if the licensee's use of scaling factors and calculations to account for hard to detect radionuclides is technically sound.

b. Waste generators shipping material intended for ultimate disposal (even through a waste processor) are required to document information on the Uniform Low-Level Radioactive Waste Manifest (NRC Forms 540 and 541) in accordance with 10 CFR 20.2006, which will require some characterization of the shipment. However, the waste classification section on NRC Form 541 is only required if the waste is consigned to a disposal facility. Instructions on filling out these forms (and what is/isn't required based on destination) can be found in 10 CFR Part 20, Appendix G and NUREG/BR-0204.

c. Consider if changes to plant operational parameters (changes in reactor coolant chemistry (e.g., fuel integrity or corrosion film morphology)) are accounted for (1) to maintain the validity of the waste stream composition data with respect to the sample analysis update, and (2) to verify that waste shipments continue to meet the requirements of 10 CFR 20.2006 and 10 CFR Part 20, Appendix G.

Note: The frequency of sample analysis update may be increased or decreased based on consideration of the waste stream. Scaling factors may be used for H-3, C-14, Tc-99 and I-129 – see RIS 2015-02, "Reporting of H-3, C-14, Tc-99 and I-129 on the Uniform Waste Manifest." Licensee staff may monitor reactor coolant radiochemistry as a method of determining if the waste stream composition has changed.

d. Consider if the licensee maintains an adequate QA program to ensure compliance with the waste classification and characterization requirements of 10 CFR 20.2006 and 10 CFR Part 20, Appendix G.

e. Consider if the waste stream mixing, sampling procedures and methodology for waste concentration averaging are consistent with the NRC branch technical positions on concentration averaging and encapsulation and waste classification, or if the licensee's approach is acceptable

71125.02-04 REFERENCES


Regulatory Guide (RG) 1.21, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste"

RG 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I"

RG 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)"

RG 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments"

RG 1.33, "Quality Assurance Program Requirements (Operation)"

RG 4.1, "Radiological Environmental Monitoring for Nuclear Power Plants"

RG 4.15, "Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination)"

RG 8.7, "Instructions for Recording and Reporting Occupational Radiation Exposure Data"

RG 8.9, "Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program"

RG 8.13, "Instruction Concerning Prenatal Radiation Exposure"

RG 8.26, "Applications of Bioassay for Fission and Activation Products"

RG 8.32, "Criteria for Establishing a Tritium Bioassay Program"

RG 8.34, "Monitoring Criteria and Methods to Calculate Occupational Radiation Doses"

RG 8.36, "Radiation Dose to the Embryo/Fetus"

NRC Bulletin 1979-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial", August 10, 1979

NRC Bulletin 1980-10, "Contamination of Nonradioactive System and Resulting Potential for Unmonitored, Uncontrolled Release to Environment"

NRC Circular 1981-07, "Control of Radioactively Contaminated Material"

NRC Generic Letter 1989-01, “Implementation of Programmatic and Procedural Controls for Radiological Effluent Technical Specifications”

NRC Information Notice 1985-92, “Surveys of Wastes Before Disposal from Nuclear Reactor Facilities”

NRC Information Notice 1986-20, “Low-Level Radioactive Waste Scaling Factors, 10 CFR Part 61”, March 28, 1986

NRC Information Notice 1990-33, “Sources of Unexpected Occupational Radiation Exposures at Spent Fuel Storage Pools”

NRC Information Notice 1997-36, “Unplanned Intakes by Worker of Transuranic Airborne Radioactive Materials and External Exposure Due to Inadequate Control of Work”

NRC Information Notice 2014-05, “Verifying Appropriate Dosimetry Evaluation”

NRC Regulatory Issue Summary (RIS) 2003-04, “Use of the Effective Dose Equivalent in Place of the Deep Dose Equivalent in Dose Assessments”, February 13, 2003

RIS 2004-01, “Method for Estimating Effective Dose Equivalent from External Radiation Sources Using Two Dosimeters”, February 17, 2004

RIS 2008-03, “Return/Re-use of Previously Discharged Radioactive Effluents”

RIS 2008-32, “Interim Low-Level Radioactive Waste Storage at Reactor Sites”

RIS 2009-09, “Use of Multiple Dosimetry and Compartment Factors in Determining Effective Dose Equivalent from External Radiation Exposures”, July 13, 2009

RIS 2015-02, “Reporting of H-3, C-14, Tc-99, and I-129 on the Uniform Waste Manifest”

NRC, “Revised Staff Technical Position on Waste Form (SP-91-13)”, January 30, 1991 (ML033630746)

NRC, “Concentration Averaging and Encapsulation Branch Technical Position, Vol. 1”, February 2015 (ML12254B065)

NRC, “Concentration Averaging and Encapsulation Branch Technical Position, Vol. 2, Response to Stakeholder Comments and Technical Basis”, February 2015 (ML12326A611)

NRC, “Revision of the Skin Dose Limit”, Federal Register, Vol. 67, No. 66, April 5, 2002, pp. 16298–16304 (67 FR 16298)

NEI 07-10A, “Generic FSAR Template Guidance for Process Control Program (PCP)” (ML091460627)

NEI 96-07, Rev. 1, “Guidelines for 10 CFR 50.59 Evaluations” (ML003686043)

NEI 98-03, Rev. 1, “Guidelines for Updating Final Safety Analysis Reports” (ML003779028)

NEI 99-02, “Regulatory Assessment Performance Indicator Guideline”

NUREG-0133, “Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants”

NUREG-1301, “Offsite Dose Calculation Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors”

NUREG-1302, “Offsite Dose Calculation Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors”

NUREG-1608, “Categorizing and Transporting Low Specific Activity Materials and Surface Contaminated Objects”

NUREG-1736, “Consolidated Guidance: 10 CFR Part 20 – Standards for Protection Against Radiation”

NUREG/CR-5569, Rev. 1, “Health Physics Positions Data Base” (HPPOS 040 and 229)

NUREG/CR-6204, “Questions and Answers Based on Revised 10 CFR Part 20” (ML12166A179)

NUREG/CR-6204, “Questions and Answers Based on Revised 10 CFR Part 20”, Questions 447 and 448 (ML12166A179)

HPPOS-016, “Applicability of Access Controls for Spent Fuel Pools” (ML103420144)

HPPOS-221, “Lower Limit of Detection (LLD) for Potentially Contaminated Oil” (ML103470158)

HPPOS-250, “Monitoring at Nuclear Power Plants for Contamination by Radionuclides that Decay by Electron Capture” (ML11192A132)

HPPOS-333, “Labeling of Radioactive Materials Stored Under Water” (ML15027A277)

ANSI N13.1-1969, “Guide to Sampling Airborne Radioactive Materials in Nuclear Facilities”

ANSI N13.6-2010, “Practice for Occupational Radiation Exposure Records Systems”

ANSI N13.30-1996, “Performance Criteria for Radiobioassay”

ANSI N13.52-1999 (Reaffirmed August 2010), “Personnel Neutron Dosimeters (Neutron Energies Less Than 20 MeV)”

END

Attachment 1: Revision History for IP 71125.02

| Commitment Tracking Number | Accession Number<br>Issue Date<br>Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information) |
|---|---|---|---|---|
| [C1] | ML26113A461<br>05/01/26<br>CN 26-019 | Reissuance and consolidation of IP 71124 series. These revisions were recommended as a result of the ADVANCE Act 507 Report to Congress that discussed the revision of the ROP Baseline Inspection Program. | | ML25274A088 |