

**From:** [Naquin, Tyrone](#)  
**To:** [Murray, Scott P. \(GE Power & Water\) \(Scott.Murray@ge.com\)](#)  
**Subject:** VNC  
**Date:** Tuesday, March 08, 2016 12:59:00 PM  
**Attachments:** [image001.png](#)

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Here are my questions for us to talk through:

Comments and further questions regarding the RAI Response for Radiation Protection Issues

Excerpts from previous inspection reports do not serve as an adequate response. The information requested by the RAI is all that is needed. Responses from previous inspection reports do not supply context to the information provided.

4.1 Section 4.1 of the application states that the content and implementation of the radiation protection program is reviewed annually pursuant to 10 CFR 20.1101. Describe in detail how the review is conducted, who prepares the review, who reviews it, and what becomes of the recommendations and goals.

Does the RSO prepare the review independently, i.e. without assistance or other staff participating.

4.2 Section 4.2 of the application describes an ALARA Committee and general membership of the committee and issues reviewed. Describe the make-up of the committee, i.e. who chairs the committee, whether senior management is a part of the committee, how often the committee meets and, are the minutes of the meetings reviewed and maintained.

Is there any senior management on the committee?

How often does the committee meet?

Is that the policy for VNC that the chair of the committee is that individual whose program generates the most dose? If so, why? Is there no conflict of interest?

4.3 Section 2.2.1.5 states one of the radiation safety function responsibilities is to review the radiation exposures of employees and visitors. Section 2.3 describes the VNC training program for staff. Describe what training is provided for visitors and contractors.

The response, an excerpt from a 2012 Region IV Inspection Report, does not supply the necessary information.

This does not address visitors, except for extended visitors, who are treated as regular employees for training.

Are all visitors treated as regular employees?

Are there no other visitors, besides contractors, to VNC?

How are NRC or CA RP staff treated for training?

4.4 Section 2.3 states that training for each individual at VNC is commensurate with assigned duties. Describe the specific tiers of training for VNC staff, i.e. administrative and monitored

employees (to include technicians and engineers). State if there are refresher requirements, whether exams are required, if there are requalification requirements for certain workers, if there is any review of the training program and instructors, and what function is responsible for the training program.

This response is an excerpt from a 2014 Region IV Inspection Report and does not adequately answer the RAI.

Is there only one level of training for all VNC staff?

Are administrative staff trained to the same level as technical staff?

Are there exams associated with the training?

The response provided states refresher training is offered, but does not say it is required. Is refresher training not required?

Does the refresher training include exams?

Does VNC review their own training program? Who does it and how is it documented?

4.6 Section 9.6 states that compliance with NRC 10 CFR 20, Subpart D for radiation dose to individual members of the public is demonstrated by assuring that the off-site annual dose to the maximum exposed individual does not exceed 100 mRem. Provide documentation that demonstrates compliance with dose limits for members of the public.

The response is an excerpt from a 2014 Region IV Inspection Report and does not adequately answer the RAI.

The response provided only addresses dose from effluents. It does not address dose due to materials or the reactor. The requirement is documentation by measurement or calculation.

4.7 Section 4.5.2 states that an access control program has been established to ensure that routine access points to contaminated areas are properly posted and operative. Describe the means of controlling access to an area; how it is allowed or limited. Explain the bases, i.e. training, clearance, etc. and who approves access.

Clarify the answer provided that states access is controlled by RWP's. What does this mean?

Are areas controlled by a guard or is access by passkey?

4.8 Section 4.5.2 states that an access control program has been established to ensure that routine access points to contaminated areas are properly posted and operative. Describe any processes and/or procedures used for personnel to exit potentially contaminated areas, to include equipment used to detect contamination and any established contamination limits.

Does VNC have any established contamination limits for exit? What processes or procedures does VNC have for the use of hand held or whole body counting equipment?

4.11 Section 4.8.2 describes a whole body counting process for selected employees. It states that baseline and termination counts are performed when feasible and that investigations are performed if a whole body count indicates an intake in excess of 10% of the applicable Annual Limit on Intake (ALI). Explain what determines feasibility for performing baseline/termination whole body counts.

Clarify whether or not whole body counting is typical and, if not, describe how investigations are carried out to determine any VNC internal exposure separate from any potential previous employment exposure.

Clarify what the application means, saying baseline and termination counts are performed when feasible? What determines feasibility? Does VNC have a Whole Body Counting Program? Who gets monitored and when?

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