

ML#

**From:** [Kellner, Robert](#)  
**To:** ["Yarley, Charles"](#)  
**Cc:** [Panfel, Jacob](#)  
**Subject:** Harris April 2018NRC Radiation Safety Inspection Document Request  
**Date:** Monday, February 26, 2018 10:20:00 AM  
**Attachments:** [HAR 2018002 Rad Haz & Trans Document Request.pdf](#)

---

Chuck,

Per your response to my previous email, you will be the licensing point of contact for the upcoming NRC Radiation Safety Inspection scheduled for the week of April 16 – 20, 2018 at the Harris Nuclear Plant. Attached is the Initial Information Request and a Document Request List.

The NRC inspectors that will be on-site during the inspection are myself, and Jacob Panfel. Both of us should be up to date on our Duke access training.

Please let me know that you received this request. If there are any questions about this inspection, or the material requested, please contact me via email, or at the phone number or address included below.

Regards,

Bob

***Robert Kellner***

Senior Health Physicist  
USNRC/Region II/DRS/EB3  
Marquis One Tower  
Suite 1200  
245 Peachtree Center Ave, NE  
Atlanta, GA 30303-1257  
(404) 997-4508

Harris Nuclear Plant  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2018002

During the week of April 16 - 20, 2018, the NRC will perform a baseline Radiation Safety Inspection at the Harris Nuclear Plant (NRC Inspection Procedures 71124.01, and 71124.08).

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 March 26, 2018.

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 Plant Support Branch 1 Chief, Brian Bonser at 404-997-4653.

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 document does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control numbers 3150-0008, 3150-0011, 3150-0014, 3150-0044, and 3150-0135.

#### 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 Cornerstone

Licensee: **Harris Nuclear Plant**

Docket Number: 05000400

Inspection Dates: April 16 - 20, 2018

Documents Due to Region II by: **March 26, 2018**

Inspection Procedures:	IP 71124.01	Radiological Hazard Assessment and Exposure Controls
	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation

Lead Inspector: Robert Kellner  
Sr. Health Physicist  
US NRC Region II  
(404) 997-4508  
[robert.kellner@nrc.gov](mailto:robert.kellner@nrc.gov)

**Note:** The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. *[Note that the inspectors cannot accept data provided on USB or "flash" drives due to NRC IT security policies.]* Please organize the information as it is arranged below to the extent possible. During the inspection, the inspectors may request additional documents. 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 for these inspection procedures, are requested from July 1, 2017 to present, unless otherwise specified. We would prefer as much of the information as possible in electronic form. An index of the CD contents 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. List of primary site contact(s) for each inspection area including name(s) and telephone numbers.
2. List of radiation protection procedures, including title and number.
3. Plant Management, Radiation Protection, and Chemistry organizational charts w/ contact numbers
4. Outage schedule, including work activities to be conducted during the week(s) of the inspection (e.g. Gantt chart or similar list)
5. Corrective action program procedure(s)

71124.01 - Radiological Hazard Assessment and Exposure Controls  
(Last Inspected July 2017)

1. List of active routine and outage related Radiation Work Permits (RWPs), including their administrative limits, electronic dosimeter dose rate limit, and dose limit.
2. Procedures related to Radiation Protection (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.).
3. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
4. List of locations, or plant maps indicating the location, of all Locked High Radiation Areas (LHRAs) and Very High Radiation Areas (VHRAs). Include areas with the potential to become a LHRA during routine operations or outages.
5. Copies of the most recent survey of all LHRAs and VHRAs (as applicable).
6. List of Nationally Tracked Sources and copies of any National Source Tracking System (NSTS) transaction documentation (e.g., change of owner ship and annual reconciliation).
7. Copy of the most recent sealed source inventory record.
8. List of all non-fuel items stored in spent fuel pool.
9. Audits and self-assessments performed since July 1, 2017 that encompass radiation protection controls/activities (radiological controls, radiological area access control, contamination control, etc.).
10. List of Corrective Action Program (CAP) documents (CRs, NCRs, PIPs, etc.) related to RP controls (e.g. keyword searches for radworker error, RP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) generated since July 1, 2017. This should include CAP nonconformance reports where the cause was listed as human performance. *This should be a list of corrective action documents containing a (CR, NCR, etc.) number and brief description, not full documents.*
11. All CAP nonconformance reports (AR, CR, NCR, etc.) related to Nationally Tracked Sources since July 1, 2017.

71124.08 - Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation (Last Inspected July 2017)

1. Procedures/Guidance documents describing licensee compliance with 10 CFR Parts 20, 61, and 71, and 49 CFR Parts 170-189. Procedures/manuals should include:
  - a. Solid and liquid radwaste processing procedures.
  - b. Procedure(s) for transferring radioactive waste resin and sludge discharges into shipping/disposal containers.
  - c. Waste stream mixing and/or sampling procedures, including:
    - i. waste concentration averaging;
    - ii. use of scaling factors and calculations used to account for difficult-to-measure radionuclides;
    - iii. ensuring waste stream composition data accounts for changing operational parameters.
  - d. Shipping/transportation procedures.
  - e. Cask loading and closure procedures (licensee and vendor) applicable to last three cask transports.
2. Process Control Program
3. List of all abandoned solid and liquid radwaste processing equipment.
4. Provide a list of RAM storage areas, including satellite radiological controlled areas (RCAs)
5. Provide the last two radio-chemical sample analysis results (i.e., "10 CFR Part 61" analysis)

- for each radioactive waste stream (e.g., dry active waste (DAW), ion exchange resins, mechanical filters, and sludges and activated materials), including QA data (e.g. in-house vs. vendor lab comparisons, current results vs. database, etc.)
6. List and documentation of any changes made to the radioactive waste processing systems (liquid and solid) and/or the Process Control Program (PCP) since the July 1, 2017, and associated 10 CFR 50.59 documentation, as appropriate.
  7. Provide a log of RAM shipments (LSA I, II, III; SCO I, II, Type A, or Type B) since July 1, 2017. (The inspectors will select three to five packages to review in detail.)
  8. Most recent self-assessment or audit of Shipping/radwaste processing and RAM storage programs.
  9. Liquid and solid radwaste system diagrams and detailed system descriptions (e.g. information that might be contained in curricula for training new system engineers)
  10. List of CAP documents (CRs, NCRs, PIPs, etc.) involving radioactive waste and RAM processing and/or transportation (e.g., keyword searches for RAM, shipping, radwaste, 10 Part 61, etc.) generated since July 1, 2017. *This should be a list of corrective action documents containing a (CR, NCR, etc.) number and brief description, not full documents.*
  11. Available for on-site review during the inspection:
    - a. Documentation describing the status of any radioactive waste process equipment that is not operational and/or is abandoned in place.
    - b. Information concerning the site's waste disposal volume and waste reduction program.
    - c. Training and qualification records for personnel responsible for radioactive waste.
    - d. Training curriculum and primary lesson plans for qualifying persons, including vendors, for radwaste processing, packaging, and making shipments of RAM and radioactive waste as specified by 49 CFR Part 172.

#### Assistance Requested During On-Site Inspection

- Identification of work activities available during the inspection for inspector observations, including notification of pre-job briefings, notification of risk significant work activities, and audio/visual surveillance for remote job coverage.
- Assistance in plant walk-downs of radwaste systems.
- Health physics assistance in plant walk-downs/job coverage of ongoing activities to assess access controls.

#### Inspector Contact Information:

Robert Kellner  
Sr. Health Physicist  
(404) 997-4508  
[robert.kellner@nrc.gov](mailto:robert.kellner@nrc.gov)

#### Mailing Address:

U.S. Nuclear Regulatory Commission  
US NRC Region II  
ATTN: Mr. Robert Kellner  
245 Peachtree Center Ave., N.E  
Suite 1200  
Atlanta, GA 30303