

Turkey Point Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2019-002

During the weeks of March 18 – 22, 2019 and April 8 – 12, 2019, the NRC will perform a baseline Radiation Safety Inspection at Turkey Point Nuclear Plant, Units 3 and 4 (NRC Inspection Procedures (IPs) 71124.01, 71124.02, 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 **March 8, 2019**.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Jonathan Rivera at 404-997-4646, or Engineering Branch 3 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/readingrm/adams.html>.

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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

Licensee: Turkey Point Nuclear Plant

Docket Number(s): 05000250 and 251

Inspection Dates: March 18 – 22, 2019

April 8 – 12, 2019

Documents Due to Region II by: March 8, 2019

Inspection Procedures (IPs):

- 71124.01 Radiological Hazard Assessment and Exposure Controls
- 71124.02 Occupational ALARA Planning and Controls
- 71124.03 In-Plant Airborne Radioactivity Control and Mitigation
- 71124.04 Occupational Dose Assessment
- 71124.05 Radiation Monitoring Instrumentation
- 71151 Performance Indicator Verification (Occupational and Public Radiation Safety Cornerstones)

Lead Inspector: Jonathan Rivera
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U.S. NRC Region II
404-997-4646
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Note: The current version of these documents is expected unless specified otherwise. We would prefer as much of the information as possible on electronic media (CD) if readily available. An index to the CD contents is also helpful. *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. Experience has shown that a poorly organized CD leads to a less efficient inspection, and places additional burden on licensee staff. 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.

General and Miscellaneous Information

1. List of primary site contact(s) for each of the inspection areas below, including name(s) and telephone numbers.
2. Plant Management and Radiation Protection organizational charts.
3. Upcoming Unit 4 (U4) R31 outage schedule, including work activities to be conducted during the weeks of the inspection.
4. Corrective Action Program (CAP) procedures.
5. Latest audits and self-assessments performed that encompass each of the inspection areas below (dates of last inspections indicated below)

71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last inspected October 2018)

1. List of active online Radiation Work Permits (RWPs) and upcoming outage RWPs, with their administrative limits, electronic dosimeter (ED) dose rate limits, and dose limits.
2. List of locations, or plant maps indicating the locations, 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.
3. Site and corporate procedures related to Health Physics (HP) controls (e.g. posting, labeling, surveys, RWPs, contamination control, High Radiation Area (HRA)/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.).
4. Most recent surveys of all LHRAs and VHRAs (as applicable).
5. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
6. List of Nationally Tracked Sources, change of ownership and copies of any National Source Tracking System (NSTS) transaction documentation (e.g., annual reconciliation).
7. Most recent sealed source inventory record.
8. List of all non-fuel items stored in the Spent Fuel Pools (SFPs).
9. List of CAP documents (e.g. NCRs, CRs, etc.) related to HP controls, including any human performance errors by radworkers and HP technicians, generated since October 1, 2018. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
10. All CRs generated related to Nationally Tracked Sources since October 1, 2018.

71124.02 - Occupational ALARA Planning and Controls

(Last inspected October 2017)

1. Site and corporate procedures associated with maintaining exposure ALARA, including those involving ALARA work activities. These procedures should include ALARA program implementation, RWP preparation and worker compliance, estimating and tracking specific exposures for work activities, making changes to dose estimates during task performance, work controls, engineering controls, exposure mitigation requirements, and source term reduction.
2. List of top five dose jobs for the upcoming U4 R31 refueling outage and associated ALARA planning packages (including dose estimates, work-hour estimates, special HP controls, and dose reduction initiatives).
3. Most recent annual ALARA report and most recent refueling outage report.
4. Annual ALARA goals for 2018 and 2019, and the methodology utilized to make the projections.
5. Current status/characterization of plant source term, as well as any relevant plans or actions to reduce it.
6. Summaries of the last four ALARA Committee Meetings (e.g., meeting minutes).
7. Completed ALARA packages (including post-job reviews) for the five work activities that had the greatest collective dose and were completed during the previous outage.
8. ALARA packages for the five work activities expected to have the greatest collective dose, and are scheduled for completion during the upcoming U4 R31 outage.
9. List of shielding packages for the upcoming U4 R31 outage.
10. Shutdown survey results for the last two outages.

11. List of NCRs, ARs, CRs, etc. related to the ALARA program issued since October 1, 2017. This should be a list of corrective action documents containing NCR, AR, CR, etc. numbers and brief descriptions, not full documents.

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

(Last inspected October 2017)

1. Site and corporate procedures related to airborne monitoring and control. These procedures should include operation, calibration, maintenance, and set-point determination of air sampling equipment; issuance, use, training, fit-testing, storage, maintenance, and quality assurance (QA) of respiratory protective equipment, including Self-Contained Breathing Apparatus (SCBA) and air-supplied respirators; SCBA maintenance of vital components (i.e., regulators); determination and verification of Grade D air for SCBAs; use of containment purge; use of portable High Efficiency Particulate Air (HEPA) / charcoal units; Total Effective Dose Equivalent (TEDE)-ALARA determinations; and alpha air sampling.
2. Two most recent HEPA filter Dioctyl phthalate (DOP) and charcoal test results for the following ventilation systems:
 - Control Room Ventilation
 - Radwaste Processing Building Ventilation
 - Auxiliary Building Ventilation
 - U4 Containment Ventilation
3. All records of grade D air quality certification for breathing air supply systems for SCBAs and air-supplied respirators filling equipment since October 1, 2017.
4. Last two surveillances performed on SCBAs stored for emergency use.
5. Available for onsite review during inspection:
 - a. Vendor training certificates for all individuals qualified to repair SCBA vital components.
 - b. List of all licensed operators, maintenance personnel, and HP personnel qualified to use SCBAs.
 - c. Inventory, inspection, and maintenance records for SCBA equipment.
6. List of NCRs, ARs, CRs, etc. related to airborne controls and respiratory protection since October 1, 2017. This should be a list of corrective action documents containing NCR, AR, CR, etc. numbers and brief descriptions, not full documents.

71124.04 - Occupational Dose Assessment

(Last inspected October 2017)

1. Site and corporate procedures related to internal and external dose monitoring (i.e., dosimetry issuance and use). These procedures should include guidance for multi- badging; monitoring in steep/highly variable dose rate gradients; personnel contamination events; storage/care of personal dosimeters; use of electronic dosimeters (EDs) including evaluation of any biases identified relative to TLD monitoring; internal dose assessment (i.e., both *in-vivo* and *in-vitro* bioassay and air sampling capabilities); guidance for calibration, QC, and use of whole body counter (WBC); release of contaminated individuals; use of passive monitoring as screening method for evaluations; special *in-vitro* sample collection and analysis; and actions for declared pregnant workers (DPWs).
2. National Voluntary Laboratory Accreditation Program (NVLAP) accreditation documentation for current dosimetry used by the site.
3. List of all positive WBCs results, *in-vitro* or air sampling analyses that resulted in an assigned committed effective dose equivalent (CEDE) equal to or exceeding 10 millirem since October 1, 2017. [Note: Only a listing should be provided for use by the inspectors to select a sample of

issues for in-depth review during the onsite inspection].

4. List of all personnel contamination events identified since October 1, 2017. *[Note: Only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection].*
5. A list of personnel who have received approved dose extensions since October 1, 2017.
6. List of NCRs, ARs, CRs, etc. related to internal and external dosimetry since October 1, 2017. This should be a list of corrective action documents containing NCR, AR, CR, etc. numbers and brief descriptions, not full documents.

71124.05 - Radiation Monitoring Instrumentation

(Last inspected October 2017)

1. Site and corporate procedures related to radiation monitoring instrumentation. These procedures should include use of portable instrument calibrators (e.g., Shepherd calibrator); calibration and functional test/source checks of portable radiation detection instrumentation; calibration and functional tests of small article monitors (SAMs), personnel contamination monitors (PCMs), portal monitor (PMs), WBC equipment, and continuous air monitors (CAMs); determination of set-points for Area Radiation Monitors (ARMs), CAMs, PCMs, PMs and SAMs; and QA program for count room instruments (e.g., laboratory inter-comparison data).
2. Last two calibration records for the Unit 3 (U3) and U4 containment high-range post-LOCA radiation monitors.
4. Documentation for the sources used to calibrate the monitors in bullet no. 2 above, showing traceability to the National Institute of Standards & Technology/National Bureau of Standards (NIST/NBS), and to the primary calibration, as applicable.
5. Last two calibration records of the portable instrument calibrator (e.g., Shepherd validation testing/dose rate curves).
6. Last two calibration records for the WBC (and PM if passive monitoring used).
7. List of any Emergency Action Level (EAL) value(s) associated with installed or portable radiation monitoring instrument indication(s).
8. Last two surveillances performed on the post-accident sampling system, as applicable.
9. List of NCRs, ARs, CRs, etc. related to radiation monitoring instrumentation since October 1, 2017. This should be a list of corrective action documents containing NCR, AR, CR, etc. numbers and brief descriptions, not full documents.

71151 - Performance Indicator Verification (Occupational and Public Radiation Safety Cornerstones)

(Last inspected October 2018 for Occupational Cornerstone and May 2018 for Public Cornerstone)

1. Site and corporate procedures for gathering and reporting Performance Indicator (PI) data.
2. Monthly / Quarterly PI reports since May 1, 2018.
3. List of all CAP documents generated since October 1, 2018 related to HP controls, using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked door, etc.
4. List of all ED dose rate alarms and ED dose alarms since October 1, 2018 that includes dose or dose rate alarm received, and the alarm setpoint(s).
5. End of calendar year (CY) 2018 liquid and gaseous effluent release permits which specify the monthly, quarterly, and annual curies released by isotope, and associated public dose assessments.

6. List of all CAP documents (e.g. NCRs, CRs, etc.) generated since May 1, 2018, using keywords abnormal/ unmonitored effluent release, etc. *[This should be a list of corrective action documents containing an AR or CR numbers and brief description, not full NCRs.]*

Inspector Contact Information

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U.S. Nuclear Regulatory Commission, Region II
Attn: Jonathan Rivera
245 Peachtree Center Ave., NE
Suite 1200
Atlanta GA, 30303

From: [Rivera, Jonathan](#)
To: [Egelstad, Donna](#)
Subject: FW: Initial Information Request for upcoming NRC RP Inspection at Turkey Point.
Date: Monday, February 25, 2019 11:43:56 AM
Attachments: [TPN 2019-002 RP RFI.pdf](#)

Hi Donna. This is ready for ADAMS. Thanks. - Jonathan

From: Rivera, Jonathan
Sent: Friday, February 01, 2019 3:08 PM
To: 'stavroula.mihalakea@fpl.com' <stavroula.mihalakea@fpl.com>
Cc: Hinson, William (William.Hinson@fpl.com) <William.Hinson@fpl.com>; Pursley, William <William.Pursley@nrc.gov>; Loo, Wade <Wade.Loo@nrc.gov>; Kellner, Robert <Robert.Kellner@nrc.gov>; Egelstad, Donna <Donna.Egelstad@nrc.gov>; Bonser, Brian <Brian.Bonser@nrc.gov>
Subject: Initial Information Request for upcoming NRC RP Inspection at Turkey Point.

Hello Stavy,

Please find attached the Initial Information Request for the NRC Radiation Safety Inspection scheduled for the weeks of **March 18 – 22, 2019** and **April 8 – 12, 2019** at Turkey Point Nuclear Plant. If there are any questions about this inspection, or the material requested, please contact me directly via email or phone. I am requesting documentation by **Friday, March 8, 2019**.

Thanks,
Jonathan

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