

2020 Inspection Procedure 71124 Update

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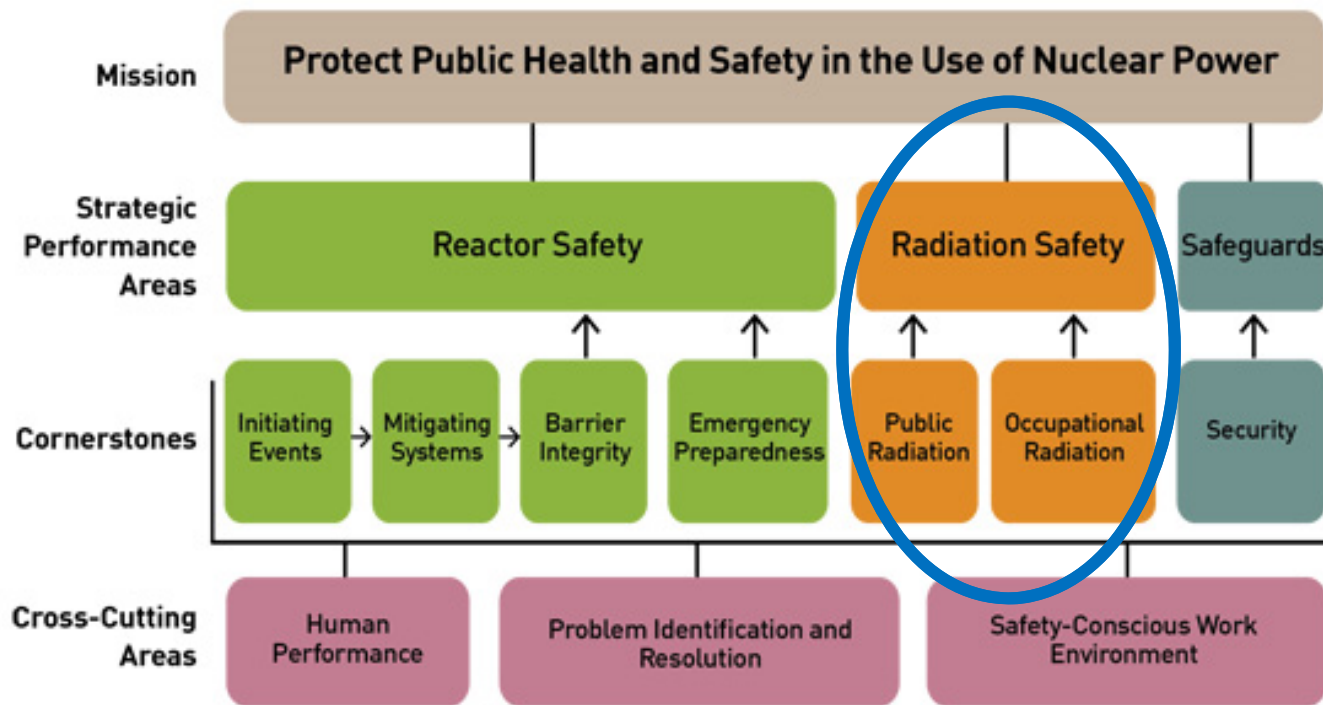
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Agenda

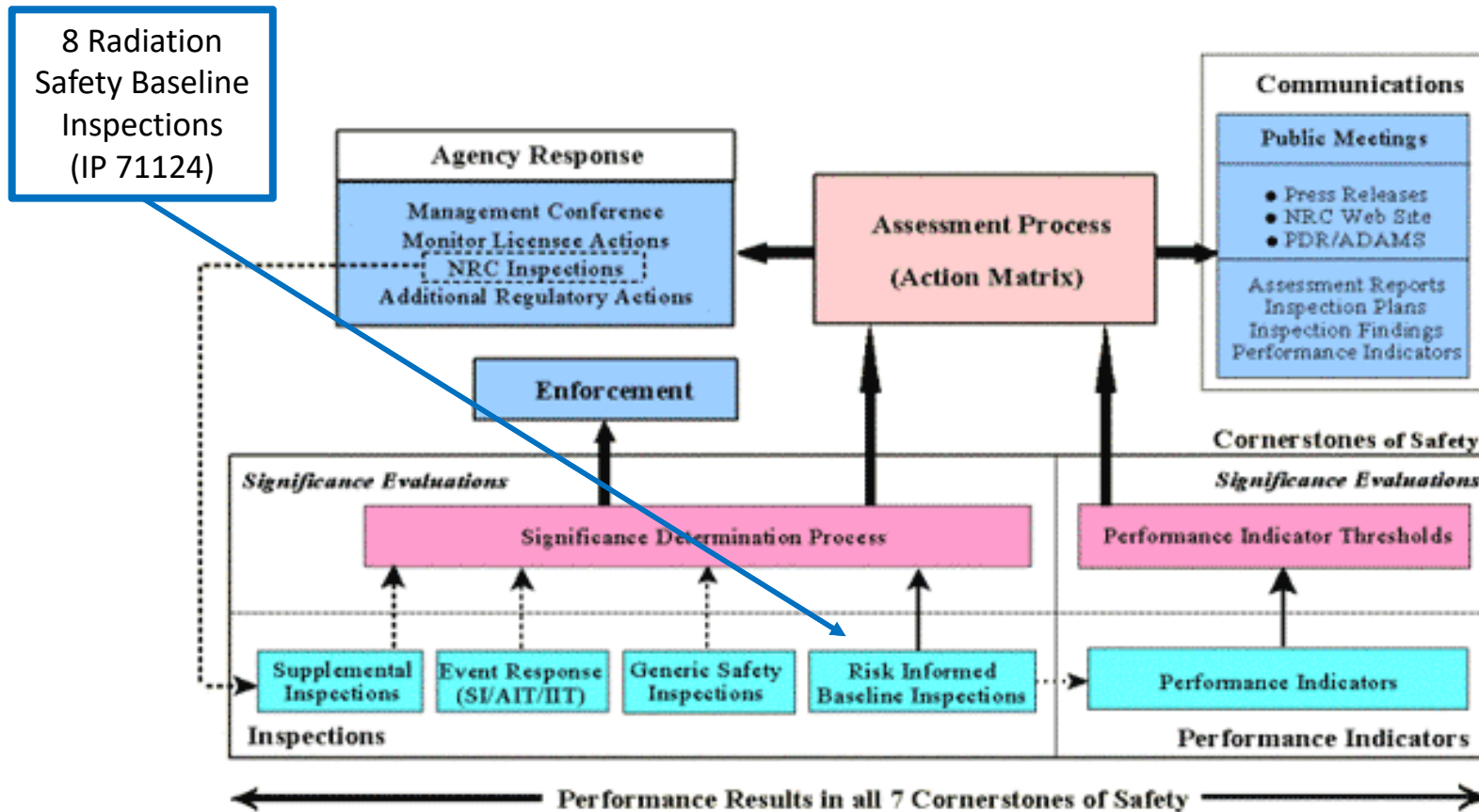
- Background - Radiation Safety Cornerstones Inspection Procedure
- Inspection Procedure (IP) Update Process
- IP 71124 Changes Under Consideration
- Schedule Looking Forward
- Feedback/Discussion
- Comments and input from the public

Radiation Safety Cornerstones

Reactor Oversight Framework



Radiation Safety Oversight and Assessment



Baseline Inspection Procedures

IP Number	Title (%PRS/%ORS)*	Nominal Hours	Inspection Samples
71124	Radiation Safety-Public Occupational	N/A	N/A
71124.01	Radiological Hazard Assessment and Exposure Controls (0%/100%)	36 +/- 4 (annual)	6
71124.02	Occupational ALARA Planning and Controls (0%/100%)**	46 +/- 14 (biennial)	4
71124.03	In-Plant Airborne Radioactivity Control and Mitigation (0%/100%)	16 +/- 4 (biennial)	3
71124.04	Occupational Dose Assessment (0%/100%)	20 +/- 4 (biennial)	4
71124.05	Radiation Monitoring Instrumentation (20%/80%)	32 +/- 4 (biennial)	2
71124.06	Radioactive Gaseous and Liquid Effluent Treatment (100%/0%)	35 +/- 4 (biennial)	5
71124.07	Radiological Environmental Monitoring Program (100%/0%)	29 +/- 4 (biennial)	2
71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage and Transportation (80%/20%)	34 +/- 4 (biennial)	5

*PRS = Public Radiation Safety Cornerstone; ORS = Occupational Radiation Safety Cornerstone

**Staff has proposed retiring this procedure (with transfer of some of its contents) as part of the ROP Enhancement effort

Inspection Procedure (IP) Revision Process

- Identify which IPs need to be revised based on:
 - Inspection experience
 - Stakeholder feedback
 - Programmatic reviews
- Develop revised procedures through internal collaboration
- Provide external stakeholders an opportunity to preview significant changes (July 23, 2019 public meeting)
- Finalize IPs
- Train staff, as necessary
- Issue final IP

Items Under Consideration

- ALARA Inspections
 - Changes are pending Commission decision
- Effluent and Instrumentation Inspection
 - Consider industry feedback from ROP Enhancement effort
- Inspection Planning
 - Explore approaches to lessen unnecessary burden on licensees while maintaining inspection scope
 - Grouping of inspection requirements
 - Developing Outage Procedure
- Oversight of Part 37

Oversight of Part 37

- Part 37 is applicable to power reactors
 - Clarifications in RIS 2015-15
- Oversight Experience
 - Temporary Instruction (TI) 2800/041, Rev 1 was completed in Jan 2018
 - RIS 2018-01 provides a listing of common violations cited during the first two years of Part 37 inspections
- Staff is working to develop a risk-informed, performance-based framework for oversight of Part 37 requirements at power reactors
- Considerations:
 - Inspections and mechanisms for dispositioning performance deficiencies under the ROP
 - Observations from TI 2800/041, Rev 1
 - Insights from other Part 37 inspection activities
 - Insights from dispositioning Part 37 issues
 - Rulemaking effort

New Baseline Inspection Procedure Format

- **Current IP 71124 Format:**
 - Section 01 Inspection Objectives
 - Section 02 Inspection Requirements
 - Section 03 Inspection Guidance
- **New IP 71124 Format:**
 - Section 01 Inspection Objectives
 - Section 02 General Guidance
 - Section 03 Inspection Samples

71111.08-03 INSPECTION SAMPLES

03.01 Inservice Inspection Activities Sample

a. Nondestructive Examination and Welding Activities. This section applies to both BWRs and PWRs.

Verify that the licensee is conducting selected NDEs appropriately and addressing any identified defects appropriately.

Specific Guidance

1. Select at least one volumetric examination and one or more other types of NDEs on risk-significant welds or components to review.

The examination review selection preference, from most preferred to least preferred, is as follows:

(a) volumetric examinations

(b) surface examinations

Excerpt from IP 71111.08 – Inservice Inspection Activities

Looking Forward

- **IP 71124 Procedure Revision**
 - Draft revisions (Spring/Summer 2019)
 - Feedback Public Meeting (July 2019)
 - Final Procedures Published (December 2019)
- **ROP Enhancement SECY (June 2019)**

Discussion/Feedback

Questions/Comments?

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