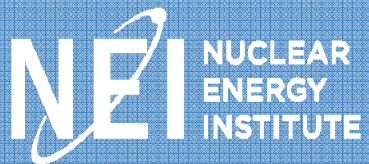


NRC Public Meeting: 2020 Inspection Procedure 71124

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Overview

- Reiterate industry's views pertinent to the NRC review of Radiation Protection inspections



Industry performance is strong

- Industry RP program performance remains strong.
 - 92% of RP findings between May 2015 and May 2019 are very low safety significance (green).
- RP programs are mature and robust; best practices, including operational experience, are widespread and freely shared.
- Technology employed in RP programs has improved since the ROP began.
 - Instruments and dosimetry can detect much lower levels of radiation and exposure than ever before.



Improved technology and innovation have identified lower levels of radiation earlier, resulting in reduced radiation exposure

- Industry's use of improved instrumentation has assisted station RP staff & workers in early identification of unauthorized high radiation area (HRA) entries.
- Use of Electronic Alarming Dosimeters (EADs) and the establishment of low dose and dose-rate set points have alerted workers to unanticipated radiological conditions due to entry into unauthorized areas or changes in radiological conditions.
- Workers responded to set point alarms from these ALARA tools by immediately leaving the areas and reporting to RP.



Industry performance warrants comprehensive rethinking of RP inspections

- NRC review should use a similar approach to that used for review of the Engineering inspection suite.
- RP inspection frequencies and sample sizes should reflect the long-standing high performance.
- Proposed frequencies and minimum inspection samples on slide # 17 of ML 19189A035 do not appear to take industry performance into account.



Inspections have become burdensome due to various inspection planning practices, including

- Arduous document requests during outage inspections.
 - ◆ Consider requesting only risk significant items.
- Grouping of several inspection areas using a team inspection approach.
 - ◆ Time-consuming and distraction to RP staff to support inspections – especially during outages.



Conclusions

- Most findings are already captured in licensees' corrective action programs.
- NRC should use this unique moment to comprehensively and holistically review the RP inspection suite.
 - Do this right. Take the time to do a quality review.
- A properly reformed RP inspection suite should help:
 - Leverage licensees' strong RP program performance and advances in technology to optimize RP oversight;
 - Reduce the burden on NRC and licensees for inspection planning and preparation;
 - Reduce the impacts on licensees during outages; and
 - Focus NRC resources on the most risk significant aspects during the most risk significant period of time.