

Diaz, Jose

From: Diaz, Jose
Sent: Thursday, January 23, 2020 1:25 PM
To: McNeil, Andrew Clair
Subject: Sequoyah RP Inspection (March 30th) Document Request
Attachments: Sequoyah RP Document Request Final.pdf

Andy,

Here is the document request letter for the upcoming March 30th RP inspection.

Respectfully,

Jose Diaz

José M. Díaz Vélez, Sr. Health Physicist

Division of Reactor Safety

Engineering Branch 3

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U. S. Nuclear Regulatory Commission

Region II Office

Marquis One Tower 245 Peachtree Center Avenue, NE

Suite 1200

Atlanta, Georgia 30303-1257

Sequoyah Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2020-001

Dear Mr. Andrew C. McNeil:

During the dates of March 30th, 2020, and April 3rd, 2020, the Nuclear Regulatory Commission (NRC) will perform the baseline Radiation Safety Inspection at the Sequoyah Nuclear Plant (NRC inspection procedures 71124.01, 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 these documents be 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 16th, 2020.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Mr. José M. Díaz-Vélez, at (404) 997-4736 or jose.diaz@nrc.gov, or the Engineering Branch 3 Chief, Binoy Desai at (404) 997-4619 or binoy.desai@nrc.gov.

In accordance with Title 10 of the Code of Federal Regulations 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 Document Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

PAPERWORK REDUCTION ACT STATEMENT

This letter 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, control number 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

Inspection Dates: March 30th, 2020 to April 3rd, 2020

Documents Due to Region II by: March 16th, 2020

Inspection Procedures: 71124.01, 71124.03, 71124.04, 71124.05, and 71151

Lead Inspector: José M. Díaz-Vélez, Sr. Health Physicist
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Additional Region II Inspectors: Carmen Dykes, Health Physicist
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Note: The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. 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 response 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.

Miscellaneous

1. Plant Management, Radiation Protection and Chemistry organizational charts with contact telephone numbers
2. List of primary contacts for each inspection area with phone numbers
3. Corrective action program procedure(s)
4. List of radiation protection procedures including title and number

71124.01 - Radiological Hazard Assessment and Exposure Controls

Last inspected: **October 25th, 2019**

1. Timeline of major outage activities (e.g. Gantt chart or similar list)
2. Procedures related to HP 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, ISFSI controls, etc.)
3. Procedures related to release of personnel and materials (e.g. release surveys, guidance for alarm follow-up, decontamination, etc.)
4. List of outage and active RWPs and corresponding alarm setpoints

5. List of locations or plant maps indicating locations of all LHRAs and VHRAs, including areas with the potential to become LHRAs during operations or outages
6. List of Nationally Tracked Sources and any change-of-ownership transactions
7. Most recent sealed source inventory record
8. List of all non-fuel items stored in spent fuel pool
9. Last two surveys of the Independent Spent Fuel Storage Installation area
10. The latest alpha characterization and part 61 analysis
11. Most recent self-assessment or audit covering HP controls
12. List of condition reports related to HP controls (e.g. radworker error, HP technician error, posting issues, HRA/LHRA/VHRA issues, rad survey problems, etc.) issued since last inspection of this area (listed above). This should be a list of corrective action documents containing a CR number and brief description, not full CRs.

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

Last inspected: **December 31st, 2018**

1. Procedures related to airborne monitoring and control (e.g. use of purge systems, reactor building ventilation, use of portable HEPA/charcoal units, temporary ventilation enclosures, use of CAMs, air sampling guidance, Alpha air sampling, etc.)
2. Procedures related to the use of respiratory protection devices, (e.g. SCBA, TEDE-ALARA guidance, PAPRs, storage, maintenance, training, QA, fit-testing, etc.)
3. The last 2 grade D air testing certificates for each supplied air system and SCBA filling station
4. SCBA qualification records
5. Vendor training certificates for all onsite individuals qualified to repair SCBA
6. List of all licensed operators qualified to use SCBA
7. List of all HP personnel qualified to use SCBA
8. Documentation for last 2 surveillances performed on SCBA stored for emergency use
9. Most recent audit or self-assessment covering airborne controls and respiratory protection
10. List of CRs related to airborne monitoring and respiratory protection since the last inspection of this area (listed above). This should be a list of corrective action documents containing a CR number and brief description, not full CRs.

71124.04 – Occupational Dose Assessment

Last inspected: **December 31st, 2018**

1. Procedures related to occupational dose assessment (e.g. dosimetry issuance and use, unusual dosimetry occurrences, multi-badging/extremity dosimetry/badge relocation,

Effective Dose Equivalent, personnel contamination events, storage/care of personal dosimeters, in-vivo and in-vitro internal dose assessment, skin dose assessment, QC for whole body counter, use of passive monitoring if applicable, declared pregnant workers)

2. NVLAP accreditation documentation for current dosimetry used by site
3. List of all positive whole body counts, in vitro, or air sampling analyses which resulted in a CEDE equal to or exceeding 10 millirem since the last inspection of this area (listed above). [Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection]
4. List of all Level III personnel contamination events identified since the last inspection of this area (listed above). [Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection.]
5. Most recent neutron characterization
6. Most recent alpha characterization
7. Last 18 months of area TLD results for the spent fuel storage area and general plant areas
8. Copies of current WBC libraries (e.g. routine, medical, investigative, etc.)
9. Most recent audit or self-assessment of the dosimetry program and/or the most recent audit of the lab that processes site dosimetry
10. List of CRs generated since the last inspection of this area (listed above), for internal or external dosimetry issues/events. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.

71124.05 – Radiation Monitoring Instrumentation

Last inspected: **December 31st, 2018**

1. Procedures/Guidance Documents for:
 - a. calibration and functional test/source checks of portable radiation detection instruments
 - b. calibration and functional tests of small article monitor, personnel contamination monitor, portal monitor, whole body counting equipment, and continuous air monitors
 - c. collection and analysis of high-range, post-accident effluent samples
 - d. QA program and calibrations for count room instruments
2. The last 2 calibration records for each of the following instruments:
 - a. Unit 1 Post-Accident Containment High Range Area Monitors (1-RE-90-271, 272, 273, and 274)
 - b. The whole-body counter in dosimetry office
3. Documentation for the radioactive sources used to calibrate the instruments in item 2 above.

4. Chart or procedure listing EALs associated with radiation monitors
5. LIST of the following instruments *[Note: only a listing should be provided for use by the inspectors to select a sample of calibration records for review during the onsite inspection]:*
 - a. Portal Monitors and personnel contamination monitors and their locations
 - b. Small article monitors/ tool and equipment and their locations
 - c. Portable radiation and contamination survey instruments available for use.
 - d. Count room instruments (gamma spec and tritium analysis)
6. Most recent test record of the instrument calibrator (Shepherd validation testing/dose rate curves)
7. The last two Inter-laboratory comparison program results (for onsite count lab)
8. Area radiation monitor's list including their calibration frequency/schedule.
9. Most recent audit or self-assessment covering HP instruments (portables, RCA exit point, WBC, count room). Include any reviews conducted of vendor facilities (e.g. WARL), as applicable
10. LIST of CRs generated since the last time this area was inspected (listed above), related to portable instruments, area monitors, CAMs, RCA release point monitors, WBCs, and count room instruments. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71151 – Performance Indicator Verification (Occupational and Public Cornerstones)

Last inspected: **September 30th, 2019**

1. Procedure(s) for gathering and reporting PI data
2. List of all CRs related to effluent dose/ODCM issues since date stated above. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.
3. LIST of all CRs related to LHRA/VHRA issues or significant (>100 mrem) unintended doses since date stated above. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.
4. Most recent gaseous and liquid effluent evaluation of dose to the public (year-to-date doses).
5. LIST of electronic dosimeter alarms since date listed above (dose and dose rate).

Onsite Assistance During Inspection

1. Identification of ongoing radiological risk significant work activities, including pre-job briefings
2. Health physics assistance with plant walk-downs of *containment, ventilations systems, waste processing areas/systems*

3. Observations of any Containment High Range Area Monitors calibrations during the on-site inspection.