From: Gibson, Richard
To: Rickman, Jim
Cc: Cooke, Lindsey; Ruffin, Myla; Adkins, Brannen
Subject: Request for Document URENCO 2020-002.docx
Date: Wednesday, April 8, 2020 9:55:10 AM
Attachments: Request for Document URENCO 2020-002.docx

Dear Mr. Rickman,

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region II staff will conduct Radiation Protection, Radioactive Waste Management, and Effluent and Environmental Controls inspections remotely during the week of May 18, 2020. The inspection is being conducted remotely due to the COVID-19 pandemic and restrictions that have been put in place. The inspections will focus on the core inspection procedures described in the NRC Inspection Manual, Manual Chapter 2600. The inspectors will use NRC Inspection Procedures (IPs) 88030 “Radiation Protection”, 88035 “Radioactive Waste Management”, and 88045, “Effluent and Environmental Controls”.

In addition, the inspectors will review a selection of your corrective actions entries to verify that you are identifying issues associated with your radiation protection, radioactive waste management, and effluent and environmental controls programs at an appropriate threshold and entering them in the corrective action program.

Experience has shown that these inspections are resource intensive both for the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to conduct a productive inspection, I have attached a request for documents and specific support needed for this inspection. It is important that all of these documents are up to date, complete, and ready for the inspectors to performed the inspection remotely.

We have discussed the schedule for these inspection activities with you and understand that our regulatory contact for this inspection will be yourself or whomever you choose to designate. If there are any questions about this inspection or the material requested, please contact me, the Region II lead inspector, at 404-99-4718.

Thank you,

Richard Gibson

ENVIRONMENTAL PROTECTION INSPECTION
RADIATION PROTECTION
WASTE MANAGEMENT
DOCUMENT REQUEST

SITE: **URENCO** | **INSPECTION REPORT NUMBER:** **2020-002**

INSPECTION DATES: May 18-22, 2020

NRC INSPECTORS:
Lead: Richard Gibson, Richard.Gibson@nrc.gov
Myla Ruffin, Myla.Ruffin@nrc.gov
Lindsey Cooke, Lindsey.Cooke@nrc.gov

ACCOMPANYING PERSONNEL:

None.

IDENTIFIED LICENSEE CONTACTS:

Licensing Specialist III, Jim Rickman, Jim.Rickman@urenco.com

ASSOCIATED PROCEDURES:

88030 – Radiation Protection (Appendix A)
88035 – Radioactive Waste Management
88045 – Effluent and Environmental Controls

Note: This is a broad list of the documents the NRC inspectors will be interested in obtaining and reviewing for a remote inspection. Due to the COVID-19 outbreak and the required shelter-in-place by some states, we are performing this inspection remotely. We recognize that there are parts of this inspection that requires us to be on-site, we will address those areas at a later date. The current version of these documents is expected unless specified otherwise. The lead inspector can answer questions regarding questions on specific information needs with licensee staff and may request additional documents. Please provide a point of contact person(s) for each area to be inspected.

DOCUMENTATION REQUESTED

1. Information Requested for Remote Inspection

Radiation Protection Appendix A (88030): L. Cooke

a. Please provide the following Radiation Protection procedures:

i. Radiation Protection (RP) Program Implementation
ii. RP Program Review
iii. RP Operating Procedures
iv. Radiation/Radiological Work Permits (RWPs)
v. Radiological Posting and Access Controls
vi. Radiation and Contamination Surveys
vii. Unplanned Contamination/Safety Significant Radiological Events Instrumentation & Equipment
viii. Calibration and set point verification for exit monitors such as hand-and-foot monitors (HFMs) and personnel contamination monitors (PCMs)

b. Please provide the following training information:

   i. Please provide three to five of the most recent examples of training/qualifications records for radiological technicians (rad techs) and qualifications records for the instructors.
   ii. A list of training and qualification/OJT requirements (qualification card or curriculum) for personnel performing RP related activities. Provide about three samples of the most recent training exams for rad tech personnel.

c. Please provide the following occupational dose records:

   The latest annual summary report on personnel exposures, (ALARA) program results and future goals/efforts, and samples of original supporting documentation, and conformation of plant management review.

d. Simple list of all corrective action items related to RP for the previous 12 months.

e. Radiation Safety Committee (or equivalent) meeting minutes for the previous 12 months.

2. Information Requested for Remote Inspection

Radioactive Waste Management (88035): M. Ruffin

a. Please provide the following operating procedures (will request specifics as needed):
   - Radioactive waste accumulation/collection/assay/storage
   - Radioactive waste volume-reduction.
   - Radioactive waste packaging, both midstream and for shipment.
   - Mixed wastes packaging/storage/shipping.
   - Decontamination facility operations
   - Radioactive wastewater collection, treatment, testing, and discharge.

b. A list of any organizational changes in personnel in the last 12 months.

c. A list of training and qualification requirements, and current training status for personnel who perform radioactive waste collection, decontamination facility operations, waste shipments, volume reduction, wastewater treatment/disposal, uranium waste assay systems, database operations for radioactive waste shipments. Be able to provide samples of training content and tests.

d. Audits/self-assessments performed during the previous 12 months for radioactive waste operations or of subcontractors used by the licensee, or of disposal contractors.

e. A list of all RWM related issues entered into the corrective action program over the previous 12 months. The list should at least include an identification number and a brief description. The inspector will review the list and may select specific corrective action items for a more detailed review.

3. Information Requested for Remote Inspection

Effluent and Environmental Controls (88045) R. Gibson

a. Organizational chart

b. Procedures relating to calibration and set point verification for liquid and gaseous effluent monitors.

c. Any independent audits or assessments of the ENV program (most recent report) and a sampling of quality assurance (QA) surveillances performed since last inspection.

d. Sampling of calibration records for analytical equipment used for analysis of samples that provide data input to effluent releases.

e. List of condition reports for last 12 months pertaining to environmental and effluent activities.

f. Sampling of data sheets relating to daily functional checks/control charts for analytical equipment (if available).

g. Most recent calibration package for stack monitor(s) and/or liquid effluent monitors as applicable.

h. Maintenance history for effluent monitoring equipment.

i. Environmental operational procedures, such as airborne and liquid effluent sample collection, sample analysis, and data collection/reporting.

j. Documentation that describes and/or defines individual radiological exhaust/ventilation stacks and other gaseous discharge points; and the methods used for collecting samples and/or monitoring airborne radioactive emissions data, calibration of environmental sampling equipment.

k. Documentation that describes and/or defines individual radiological liquid outfalls and any other liquid effluent discharge points, and the methods used for collecting samples and/or monitoring radioactive effluent data.

l. Documents transmitted to local, state, and federal for gaseous/air discharges via stacks, liquid discharges including river discharges, and storm water discharges.

m. Groundwater sampling data produced within the last year.

n. Specific air sampling items:
   - Documentation from assessing and/or reassessing flow rates from stacks. When were these calibrations performed?
   - Documentation that presents the actual calculations and their use to quantify and determine compliance with dose to the public.
   - Any occasional hand calculations performed to confirm automated calculations accuracy.

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0009). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: O-1F13, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0009) Office of Management and Budget, Washington, DC 20503.