

From: [Kellner, Bob](#)
To: ["Sherrill, Thomas M"](#)
Cc: [Salazar, Sabrina](#); [Diaz, Jose](#)
Subject: NRC Radiation Safety Inspection - June 2020
Date: Wednesday, April 29, 2020 11:03:10 AM
Attachments: [BRU 2020002 RFI Radiation Safety Baseline Inspection Information Request.pdf](#)

Tom,

Thank you for confirming that will be the point of contact for the upcoming scheduled Radiation Safety Inspection at Brunswick.

Attached is the Request for Information for the upcoming RP inspection. The request includes a list of the documents we normally would request for Inspection Procedures (IPs) 71124.06, 71124.07, and the Public portion of IP 71151. As of now, Jose Diaz and I are the two inspectors scheduled to complete this inspection.

Given the current Duke policy of 'non-essential personnel' only, and the uncertainty of future NRC travel due to COVID-19 restrictions, I don't know if we will be able to be on-site to complete the inspection. Depending on how things evolve, and if COVID-19 work and travel limitations are relaxed, we may pursue some combination of partial, remote, or reduced on-site inspection time to complete the inspection activities. If you can update me when Brunswick is willing to allow reduced, or limited, on-site inspection I would appreciate it. I will let you know as soon as I receive any specific travel guidance from NRC management.

Please let me know if you have any questions.

Regards,

Bob

Robert Kellner, Senior Health Physicist

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Brunswick Steam Electric Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2020002

During the week of June 15 - 19, 2020, the Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at the Brunswick Steam Electric Plant (NRC Inspection Procedures 71124.06, 71124.07, 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 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 June 5, 2020.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Robert Kellner, at Robert.Kellner@nrc.gov, or 404-997-4508, or the Engineering Branch 3 Chief, Binoy Desai at 404-997-4519.

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

Public Radiation Safety Cornerstone

Inspection Dates: June 15-19, 2020

Documents Due to Region II by: June 5, 2020

Inspection Procedures:	IP 71124.06	Gaseous and Liquid Effluent
	IP 71124.07	REMP
	IP 71151	Performance Indicator Verification

Lead Inspector and Mailing Address:

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Note: The current version of these documents is expected unless specified otherwise. Secure file server access (Certrec, SharePoint, etc.), or electronic media (CD/DVD), is preferred. To the extent possible, please organize the information as it is arranged below. Experience has shown that poorly organized files can lead to a less efficient inspection and places additional burden on licensee staff. During the inspection, the inspectors may request additional documents. 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. To the extent possible, please organize the information as it is arranged below. Pay 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.

Documentation for these inspection procedures, are requested from June 1, 2018 to present, unless otherwise specified. Pay attention to the date ranges for the items requested as they may change from item to item. For those items requesting a list of documents/areas, the inspector will select documents/areas from the list for on-site review. The NRC requests that these documents be provided to the inspectors no later than June 5, 2020.

Miscellaneous

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

71124.06 – Radioactive Gaseous and Liquid Effluent Treatment

(Last inspected June 2018)

1. Procedures for sampling and controlling radioactive gaseous and liquid effluents to include: collection, analysis, release, alarm setpoints, offsite dose calculation and evaluation.
2. Provide a LIST of changes made to the Offsite Dose Calculation Manual (ODCM), meteorological dispersion or deposition factors, and radioactive effluent processing/discharge systems since June 1, 2018.
3. List of “out of service” (OOS) effluent monitors and duration since June 1, 2018.
4. Most Recent 10 CFR Part 61 analyses for the Dry Active Waste (DAW) including QA data (e.g. in-house vs. vendor lab comparisons, current results vs. database, etc.)
5. Provide a LIST of all unmonitored spills, leaks, or unexpected liquid/gaseous discharges since June 1, 2018.
6. Provide a schedule of expected or planned routine effluent sampling activities (e.g. weekly main vent stack, groundwater sampling, etc.) during the planned inspection week.
7. Material condition surveillance records for effluent treatment system components not readily accessible for any reason (e.g. in-service & spent resin tanks, waste gas hold-up tanks, etc.).
8. The last two Inter-laboratory comparison program results (for the onsite counting lab).
9. Most recent audit, self-assessment, and/or review of the radioactive effluent monitoring program
10. List of CRs generated since June 1, 2018, as a result of gaseous and liquid effluent processing and/or ODCM related activities. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71124.07 – Radiological Environment Monitoring Program (REMP)

(Last inspected June 2018)

1. Procedures for radiological environmental monitoring including but not limited to:
 - a) Collection, preparation and analysis of all environmental samples
 - b) Calibration and maintenance of REMP air and/or water samplers
 - c) Calibration of meteorological monitoring instruments
 - d) Periodic meteorological instrumentation surveillance requirements
 - e) Land use census
 - f) Calibration and quality control of for sample counting instruments
2. Procedures associated with the NEI/industry groundwater protection initiative.
3. 2018 and 2019 Land Use Census Results Evaluation or Report.
4. Collection schedule for REMP samples to be obtained during the planned inspection week, and contact information for collection staff.
5. Last two calibration records for REMP air and water sampling equipment.
6. Last two calibration records for meteorological monitoring instrumentation on the primary tower (wind speed & direction, and air temperature).
7. Data recovery report for meteorological monitoring instruments since June 1, 2018.
8. List of systems, structures and components identified as credible mechanisms for the potential release of licensed material to the groundwater (e.g. SSC risk ranking matrix)
9. List of any non-radioactive system that has become contaminated since June 1, 2018.

10. Summary of any leaks and/or spills that have occurred since June 1, 2018 (e.g. copy of 10.75g file).
11. Copies of any reports to the NRC regarding abnormal onsite spills/leaks or radioactive material since June 1, 2018.
12. Groundwater monitoring results since June 1, 2018.
13. Environmental TLD results since June 1, 2018.
14. List of onsite surface water bodies (e.g. ponds, retention basins, lakes) that contain or can potentially contain radioactivity
15. Most recent audit/self-assessments of REMP activities, including audits of vendor activities.
16. List of all CAP documents related to REMP activities or groundwater, including leaks or spills since June 1, 2018. *This should be a list of documents containing a CAP document number and a brief description, not complete documents.*

71151 – Performance Indicator Verification (Occupational and Public Cornerstones)

(Last inspected April 2019)

1. Procedure(s) for gathering and reporting PI data.
2. List of all CRs related to effluent dose/ODCM issues since April 1, 2019. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
3. Copy of the most recent gaseous and liquid effluent release permits indicating the current dose to the public (year-to-date doses).

Onsite Assistance During Inspection

- Health physics assistance with plant walk-downs of meteorological tower, ventilation systems, and gaseous and liquid waste processing systems.
- Health physics /Chemistry coordination for observation of REMP Effluents sampling activities (REMP Run and on-site effluent samples).

Inspector Contact Information:

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