

From: [Murray, Scott P. \(GE Power Portfolio\)](#)
To: [Bartlett, Matt](#)
Subject: [External_Sender] RE: RE-verification of License Condition for Unplanned Contamination Exemption
Date: Friday, June 12, 2020 4:06:07 PM

GNF-A concurs with the modified license condition shown below.

From: Bartlett, Matt <Matthew.Bartlett@nrc.gov>
Sent: Friday, June 12, 2020 1:36 PM
To: Murray, Scott P. (GE Power Portfolio) <Scott.Murray@ge.com>
Subject: EXT: FW: RE-verification of License Condition for Unplanned Contamination Exemption

Scott,

Below is the latest version from OGC. Can you send back an email confirming GNF-A finds the text acceptable?

Thanks.

In your application **of January 9, 2019**, for an exemption from reporting certain unplanned contamination events, you proposed the following license condition:

- S-5 Notwithstanding the requirements of 10 CFR 70.50(b)(1), the licensee is exempt from the requirement to notify the NRC within 24 hours of unplanned contamination events inside an established contamination radiological controlled area (C-RCA) that requires worker access to the C-RCA, or any portion thereof, to be restricted for more than 24 hours by imposing additional radiological controls or by prohibiting entry into the area.

The licensee commits to 1) Establish and post C-RCAs that reside within the licensed Controlled Access Area (CAA) which is not accessible to the public without escort, 2) Impose controls as necessary to keep radiation exposures and releases as low as reasonably achievable, 3) Ensure radiation protection personnel are trained and qualified in contamination control and are readily available, 4) Provide equipment and facilities that may be needed for contamination control, 5) Perform radiation surveys of unplanned contamination events in C-RCAs and provide records for NRC inspection upon request, 6) Train unescorted workers in C-RCAs on methods to reduce radiation exposures including contamination controls and response actions for abnormal or upset conditions.

During the discussions between GNFA and NRC on March 16, April 20, and June 11 2020, we came to a common understanding that the proposed license condition would be modified as follows:

- S-5 Notwithstanding the requirements of 10 CFR 70.50(b)(1), the licensee is exempted from the requirement to report unplanned contamination events when the following conditions are met:
1. The event occurs in a restricted area in a building which is maintained

- inaccessible to the public by multiple access controls,
2. The area was controlled for contamination before the event occurred, the release of radioactive material is under control, and no contamination has spread outside the area,
 3. Radiation safety personnel trained in contamination control are readily available,
 4. Equipment and facilities that may be needed for contamination control are readily available, and
 5. The otherwise reportable unplanned contamination event is documented in the licensee's Corrective Action Program.

Sincerely,

Matt Bartlett
NMSS/FCSE/FFLB
Fuel Cycle Project Manager
301-415-7154