



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 8, 2021

MEMORANDUM TO: Kevin Hsueh, Chief
Radiation Protection and Consequence Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: David Garmon, Health Physicist **/RA/**
Radiation Protection and Consequence Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION
PUBLIC MEETING ON OCTOBER 21, 2020 TO DISCUSS
UPDATES TO THE RADIATION SAFETY SIGNIFICANCE
DETERMINATION PROCESSES

On October 21, 2020, the U. S. Nuclear Regulatory Commission (NRC) staff conducted a category 2 public meeting (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20294A186) to review changes to the reactor radiation safety significance determination process (SDP).

Purpose

Discuss changes the staff is considering for Inspection Manual Chapter (IMC) 0609, App C and D and their corresponding basis documents IMC 0308, attachment (Att) 3, appendices (App) C and D.

Meeting Summary

NRC staff's presentation (ADAMS Accession No. ML20290A462) began with an overview of the NRC's Principles of Good Regulation and a brief overview of the Reactor Oversight Process (ROP) and the SDP. The NRC staff then discussed the updates that are being proposed to the IMC 0609, App C and D and IMC 0308, Att 3, App C and D.

Enclosure:
Meeting Attendance List

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The staff is updating the guidance relevant to the radiation protection SDP to address situations where incorrect packaging is used in transportation of radioactive materials; to introduce a process to disposition inspection findings involving the Title 10 of the *Code of Federal Regulations* (CFR Part 37); to clarify guidance for certain types of transportation-related inspection findings and to update the bases to conform with current practice. The staff explained that the update for the public radiation safety cornerstone SDP will start from a draft revision that was published in 2018 (ADAMS Accession No. ML18178A100). This 2018 draft provided the staff's proposal for updating the SDP to address incorrect packaging used in transportation of radioactive materials. The staff has reviewed and considered comments provided by the Nuclear Energy Institute regarding the 2018 draft (ADAMS Accession No. ML18264A305) during the development of the most recent draft of the SDP.

The staff then provided a brief overview of the proposed SDP for inspections involving 10 CFR Part 37. As proposed, the SDP would separate findings in Subparts A, B and C from those in Subpart D into two SDP flowcharts. One flowchart would address findings that result in actual loss of category 1 or category 2 radioactive material from the site; access to category 1 or category 2 radioactive material by personnel who are not trustworthy and reliable; and deficiencies in security zones. A second flowchart would address findings that result in actual loss of category 1 or category 2 radioactive material while the material is in transport; deficiencies in licensee verification; preplanning and coordination issues; and certain deficiencies in physical protection while category 1 or category 2 material is in transit. Finally, the staff explained that the version presented during the meeting would have to undergo internal review and would be subject to change pending the results of internal review.

Following the staff's remarks, several external stakeholders provided input for the NRC's consideration. One industry representative cautioned against the consideration of the impact of deficiencies on 3rd parties (e.g., states or radioactive material disposal facilities) when determining the significance of findings. Additionally, multiple stakeholders observed the similarities between the security requirements of 10 CFR Part 73 and 10 CFR Part 37 as it pertains to commercial nuclear power facilities.

The staff stated that as of October, the SDP was still under internal development and review and that updates during the ROP Monthly meetings would be available upon request of the participants. Additionally, the staff plans to hold a public meeting in the near future to discuss the results of the internal review of the draft documents.

Public Comments

There were no comments from members of the public.

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OCTOBER 21, 2020 TO DISCUSS UPDATES TO THE RADIATION SAFETY
SIGNIFICANCE DETERMINATION PROCESSES DATED: 2/08/2021

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OFFICE	NRR/DRA/ARCB	NRR/DRA/ARCB: BC
NAME	DGarmon	KHsueh
DATE	12 /30/ 2020	2/08/2021

OFFICIAL RECORD COPY

MEETING ATTENDANCE LIST

David Garmon	NRC	James Slider	NEI
Ed Stutzcage	NRC	Janet Schlueter	NEI
Greg Warnick	NRC	Marty Phalen	NEI
John Cassidy	NRC	Lisa Hogg	NEI
Kevin Hsueh	NRC	Maggie Staiger	NEI
Micheal Smith	NRC	Richard Mogavero	NEI
Michele Burgess	NRC	Linda Cewhirst	NPPD
Alonzo Richardson	NRC	David Brehm	OPPE
Anthony Dimitriadis	NRC	Coleman Miller	Pacific Gas and Electric
Bill Rautzen	NRC		PBNP
Paul Goldberg	NRC	Jerri Walters	PGNE
Carmen Dykes	NRC	Coleman Miller	PSEG
David Alire	NRC	Bob Porter	PSEG
George Smith	NRC	Harrold Tremble	South TX Project
Natasha Greene	NRC	Clayton Stone	Radiation Safety and Control Services
Steve Garry	NRC	Ellen Anderson	South Texas Project
Zachary Gran	NRC		South TX Project
Marsha Anderson	ANI	Walter Fulton	South TX Project
Shane Gatter	ATE- Firm 2		South TX Project
Vince Miller	Cameron MO	Lance Sterling	South TX Project
Jean Flemming	CSEG	Drew Richards	South TX Project
Dean Raleigh	Curtiss Wright	Zachary Dibber	Southern Nuclear
Robin Richmond	Curtiss Wright	Matthew Euten	Certrec Corp
Allen Fulmer	Dominion Energy	John Conly	TVA
Dan Shannon	Dominion Energy	Elizabeth Langille	TVA
Daniel Shannon	Dominion Energy	Patrick Asendorf	TVA
Chris Newton	Duke Energy	John Johnson	Wolf Creek
Chris Osborn	Duke Energy	Nicole Goode	
Chris Whitener	Duke Energy	Chris Nolan	
Sam Wender	Energy Harbor		
Brad Cole	Entergy		
John Gibbins	Entergy		
Stephanie Cyles	Entergy		
Steven Martin	Etel		
Mart Pawlowski	Exelon		
David Guder	Exelon		
Jackie Smith	Exelon		
Mark Pulaski	Exelon		
Joe Dwyer	Holtec		
	Decommissioning International		
Thomas Roddey	INPO		

Enclosure