



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION II  
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200  
ATLANTA, GEORGIA 30303-1200

November 10, 2021

**INSPECTION DOCUMENT REQUEST**

**Licensee:** BWXT Nuclear Operations Group, Inc.

**Facility:** BWXT NOG in Lynchburg, VA

**Docket Number:** 07000027 (or 70-27)

**License Number:** SNM-42

**Inspection Report Number:** 2021-004

**Enterprise Number:** EPID: I-2021-004-0035

**Inspection Dates:** December 6 – 10, 2021

**Inspection Procedures:** IP 88030 – Radiation Protection, revised 1/29/2021  
IP 88045 – Effluent Control and Environmental Protection, revised 3/12/2021

ADAMS ACCESSION NUMBER: **ML21314A420**

**Inspector(s):**

Gregory Goff (Team Leader)  
Fuel Facility Inspector  
U.S. Nuclear Regulatory Commission (NRC)  
Region-II Office  
[gregory.goff@nrc.gov](mailto:gregory.goff@nrc.gov)

Paul Startz  
Fuel Facility Inspector  
U.S. NRC  
Region-II Office  
[Paul.Startz@nrc.gov](mailto:Paul.Startz@nrc.gov)

Lindsey Cooke  
Fuel Facility Inspector  
U.S. NRC  
Region-II Office  
[Lindsey.Cooke@nrc.gov](mailto:Lindsey.Cooke@nrc.gov)

## INSPECTION DOCUMENT REQUEST

The following is a broad list of documents the U.S. Nuclear Regulatory Commission inspectors are interested in reviewing prior to the on-site inspection visit. Typically, we arrange an electronic repository/reading room called "BOX" for such requests. But, we realize many documents requested could be classified. Moreover, even if not classified, a labor-intensive review must be performed by licensee personnel to verify no classified information is contained within an unclassified document.

Hence, we request a list of the documents below, as applicable, to be uploaded into BOX.

A list of the most current version of these documents is requested. The list of documents provided in response to this request should contain sufficient information to facilitate the selection of specific inspection samples. For example, for any procedure it would be very useful to have the procedure number, the procedure title, and the revision/version number. In the past, just submitting a list of procedure numbers did not provide us with sufficient information.

Some of the information requested may not apply to your specific facility. The licensee is not required to provide documents that are already available in ADAMS. If there are any questions or concerns regarding the information requested, please contact the NRC inspection team leader.

### **INSPECTION PROCEDURE 88030 – RADIATION PROTECTION - G. Goff & P. Startz**

#### Documents Requested for In-Office Preparation

- 1) Organization chart with respect to personnel involved radiation protection (RP). Please include their contact information if they can support the inspection. Please note any personnel changes within the last 12 months.
- 2) Procedures governing the implementation of the Radiation Protection Program, including:
  - i. Radiation Protection (RP) Program Implementation
  - ii. RP Program Review and/or ALARA Program Review
  - iii. RP Operating Procedures
  - iv. RP Management Procedures
  - v. Radiation/Radiological Work Permits (RWPs)
  - vi. Radiological Postings and Access Controls
  - vii. Radiation and Contamination Surveys
  - viii. Respiratory Protection Program
  - ix. Airborne Radioactivity Monitoring
  - x. Dosimetry Program
  - xi. Personnel OSLD/TLD Monitoring Program
  - xii. Unplanned Contamination/Safety Significant Radiological Events Instrumentation & Equipment

- xiii. Calibration and set point verification for exit monitors such as hand-and-foot monitors(HFMs) and personnel contamination monitors (PCMs)
- 3) Radiological dose reports and records for dose results for workers, minors, and the public.
- 4) Records for internal dose results.
- 5) Records for bioassay program.
- 6) Records of any significant radiological events within the last 12 months.
- 7) Training records of the most recent examples of training/qualifications records for radiological technicians (rad techs) and qualifications records for the instructors.
- 8) A list of training and qualification/OJT requirements (qualification card or curriculum) for personnel performing RP related activities. Please provide about three samples of the most recent training exams for rad tech personnel.
- 9) The latest annual summary report on personnel exposures, (ALARA) program results and future goals/efforts, samples of original supporting documentation, and conformation of plant management review.
- 10) Listing of corrective actions related to RP for the previous 12 months.
- 11) Radiation Safety Committee meeting minutes for the previous 12 months.
- 12) Copy of the most recent self-assessment and/or audits report in the area of Radiation Protection.
- 13) Contact information for key personnel expected to support the Radiation Protection Inspection.

#### **INSPECTION PROCEDURE 88045 – EFFLUENT CONTROL & ENVIRONMENTAL PROTECTION – L. Cooke**

##### **Documents Requested for In-Office Preparation**

- 1) Organizational chart with respect to personnel involved in Effluent Control and Environmental Protection (also referred to as “environmental protection” or “ENV”). Please include their contact information if they can support the inspection. Please note any personnel changes within the last 12 months.
- 2) Qualification and training records of any new employees in environmental protection.
- 3) Documentation for any changes to the environmental protection program since the last inspection

- 4) Audits/assessments of any environmental protection areas (within the last year).
- 5) Audits/assessments of vendors that supply services for environmental protection (within the last year).
- 6) A list of corrective actions for findings identified in such audits/assessments.
- 7) A list of corrective action for upsets/issues/exceedances/events in environmental protection since the last inspection.
- 8) Any other records used to log environmental protection-related events or upsets.
- 9) Environmental protection procedures, including:
  - program procedures;
  - procedures for updating maps/lists of environmental contamination (if applicable);
  - procedures for investigation potential or actual contamination;
  - management procedures for: airborne sample collection (stack filters), wastewater treatment/liquid effluent treatment and sample collection, environmental air sampler filter change-outs, sediment/soil procurement, vegetation procurement, groundwater/well sampling, and sewer discharges/treatment;
  - operational procedures for: airborne sample collection (stack filters), wastewater treatment/liquid effluent treatment and sample collection, environmental air sampler filter change-outs, sediment/soil/vegetation sample collection, groundwater/well sample procurement, sewer discharges/treatment, sample analysis, and data collection/reporting;
  - surveillance and calibration procedures for sampling and measurement instrumentation;
  - procedure(s) for adding vendors to approved supplier lists and for auditing those vendors; and
  - event reporting procedures (including what needs to be reported internally).
- 10) For new or changed procedures (since the last inspection) please also include the former procedure or a mark-up showing the changes and the change package used to change the procedure, if any. Include any new training associated with the change(s).
- 11) 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. (May already be covered by line item #9 above.)
- 12) 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 for those points. (May already be covered by line item #9 above.)
- 13) Groundwater sampling data produced within the last year

- 14) The most recent calibration records for all instruments used to analyze radioactive contamination/radioactivity in air samples and liquid samples.
- 15) List of any newly identified subsurface or environmental contamination (found within the last year).
- 16) Measurement and calculations used evaluate releases (and any trending) and evaluation of trends. Including any releases to municipal sewers or on-site "sewers".
- 17) Records of any samples that were cross-checked by independent labs.
- 18) Documents transmitted to local, state, and federal agencies for gaseous/air discharges via stacks, liquid discharges (including river discharges), and storm water discharges.
- 19) Records and monitoring of buried waste and waste ponds (if applicable). Including any monitoring to determine that buried non-radioactive waste is indeed non-radioactive.
- 20) ALARA reports for the last year (these will also be needed for the RP inspection and may be placed with those documents if it is more convenient).
- 21) The basis of any alarm setpoints used for monitoring instruments.
- 22) Documentation assessing and/or reassessing flow rates from stacks/gaseous release points.
- 23) The two most recent calibration records for the instrumentation used to monitor the gross alpha/beta of stack gas effluent and the liquid effluent released to the river (including, flow rate instrumentation). (May already be covered by line item #14 above.)
- 24) Radiological waste procedures for classification.
- 25) Radiological waste procedures for characterization.
- 26) Radiological waste procedures for handling and storage.
- 27) Radiological waste shipment records over the last 12 months.

**FOCUS AREA:** Both inspection modules plan to focus on the Waste Treatment Facility.

**NOTIFICATION:**

*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](mailto: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.*