

**From:** [Pursley, William](#)  
**To:** [Floyd, William H.](#); [Surber, Ronnie Gene](#)  
**Subject:** Farley 2022004 RP Occupational Baseline Document Request.pdf  
**Date:** Monday, August 15, 2022 2:29:00 PM  
**Attachments:** [Farley 2022004 RP Occupational Baseline Document Request.pdf](#)

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Gene/Holt

Our document request is attached. Please distribute it to the appropriate site people.

We would like the documents available to us by September 19 if possible.

The inspectors scheduled to come are Jonathan Rivera, HP inspector R2 and Jose Diaz the first week and Jack Bell the second week. I think everyone is badged at Farley.

Please don't hesitate to call/email me if you have any questions.

Thanks,

William (Bill) Pursley  
USNRC RII Health Physicist  
404 997-4517

Farley Nuclear Plant Southern  
Nuclear Operating Co., Inc.  
Radiation Safety Baseline Inspection  
Initial Information Request  
Inspection Report: 2022004

During the weeks of September 26 – 30 and October 17 – 21, 2022 the NRC will perform a baseline Radiation Safety Inspection at Farley Nuclear Plant (NRC Inspection Procedures 71124.01, 71124.03, 71124.04, 71124.05 and the occupational and public radiation safety sections of 71151).

To minimize the impact to your onsite resources during the inspection and ensure the inspectors have the necessary information to complete the inspection while on site, we have enclosed a request for documents needed for this activity. The NRC requests that these documents be provided to the inspectors no later than September 19, 2022.

If there are any questions about this inspection or the material requested, please contact the lead inspector, William Pursley at 404-997-4517, or the Engineering Branch 3 Chief, Binoy Desai at 404-997-4519.

In accordance with Title 10 of the Code of Federal Regulations (10 CFR) 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 Documents Access and Management System (ADAMS); accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

#### PAPERWORK REDUCTION ACT STATEMENT

This document 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 under control numbers 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**

Inspection Dates: September 26 – 30 and October 17 – 21,

2022 Documents Due to Region II by: September 19, 2022

|                                       |  |
|---------------------------------------|--|
| Inspection Procedures (IPs): 71124.01 | Radiological Hazard Assessment and Exposure Controls   |
| 71124.03                              | In-Plant Airborne Radioactivity Control and Mitigation |
| 71124.04                              | Occupational Dose Assessment                           |
| 71124.05                              | Radiation Monitoring Instrumentation                   |
| 71151                                 | Performance Indicator Verification                     |

**Note:** Please provide the current version of these documents in an electronic format if possible (The preferred file format is MSWord, or searchable “.pdf” files). To the extent possible, please organize the information in directories as requested below. Recent experience has demonstrated the most efficient method to transfer this information to the NRC is via Certrec. It is best to upload all the requested information in one large “zip” file. If there are questions regarding the documents requested, or method of transfer, please do not hesitate to contact the lead inspector.

Documentation for IPs 71124.01 and 71151 should be from **April 1, 2021**. Documentation for IP 71124.03, 71124.04, 71124.05 (ALARA) should be from **October 1 2020**. These dates are approximate to the last time these inspections were conducted. Also, provide only a listing and title for NCRs requested for each inspection procedure and inspectors will select a sample from these for in-depth review during the inspection.

If you have any questions, please call William Pursley at (404) 997-4517. Thank you in advance for your effort in putting together this material.

### **General and Miscellaneous Information**

- List of primary site contact(s) for each inspection area including name(s) and telephone numbers.
- Corrective Action Program procedures.
- Plant Management and Radiation Protection organizational charts w/ contact numbers.
- Internal and external assessments and audits of the RP program since October 1, 2020 (excluding INPO) on the subjects of (1) the ALARA program, (2) respiratory protection, (3) airborne radioactivity, monitoring and/or mitigation-engineering controls, and (4) radiological monitoring instrumentation (portable, installed, and counting room instruments).

### **71124.01 - Radiological Hazard Assessment and Exposure Controls**

(Last Inspected April 2021)

1. List of active RWPs, including outage RWPs, with their administrative limits, electronic dosimeter dose rate limit, and dose limit.
2. List of locations, or plant maps indicating the location, of all LHRAs and VHRAs. Include areas with the potential to become a LHRA during routine operations or outages.
3. Procedures related to HP controls (e.g. Posting, labeling, surveys, RWPs, contamination control, HRA/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.).

4. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow up, etc.).
5. List of all non-fuel items stored in spent fuel pool.
6. List of condition reports (e.g. NCRs, CRs, ARs etc.) related to HP controls where the cause was listed as human performance (radworker error) or human performance (HP technician error) generated since April 1, 2021. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.
7. List of top five dose jobs for the upcoming refueling outage and ALARA associated planning packages
8. Last Outage or Annual ALARA report as applicable for each unit.

### **71124.03 - In-Plant Airborne Radioactivity Control and Mitigation**

(Last Inspected October 2020)

1. Site and corporate procedures/manuals associated with airborne radiation monitoring instrumentation and respiratory protection. Procedures/manuals should include:
  - Operation, calibration, and maintenance of air sampling instrumentation, including set-point determination (e.g., low-vols, high vols, goosenecks, AMS 4s, etc.)
  - Actions to be taken when air sampling instrumentation is found to be significantly out of tolerance/calibration
  - Issuance and use of respiratory protective equipment (emphasis on SCBA and air-supplied equipment)
  - Total Effective Dose Equivalent-ALARA evaluation guidance
  - Training, including fit-testing, for use of SCBA and supplied-air systems
  - SCBA maintenance activities, including vital components (i.e. regulators)
  - Determination/verification of Grade D air for SCBA
2. Surveillance procedures for and the most recent HEPA filter DOP and charcoal test results, if available, for the Auxiliary and Radwaste Area Ventilation System and Spent Fuel Pool Area Ventilation System.
3. Operational guidance (procedures, policies, etc) for the Rx Bldg purge system.
4. Records of certification of air quality for equipment used to provide breathing air for air-supplied respirators and SCBA bottles (air compressors and bottled breathing air) since September 1, 2020.
5. Documentation for last two surveillances performed on SCBA stored for emergency use.
6. List of condition reports (e.g. NCRs, CRs, ARs etc.) generated since October 1, 2020 involving radiation monitoring and protective equipment deficiencies, including CAMs, respiratory protection equipment and/or program implementation
7. Last two surveillance tests for the HEPA and charcoal filtration units in the control room emergency ventilation system.

#### **71124.04: Occupational Dose Assessment**

(Last Inspected October 2020)

1. Site and corporate Procedures/Guidance Documents for external dose monitoring, i.e. dosimetry issuance and use. The documents should include:
  - Guidance for multi-badging
  - Personnel contamination events; storage/care of personal dosimeters; use of electronic dosimeters including evaluation of any biases identified relative to TLD monitoring
  - Internal dose assessment, i.e., both *in vivo* and *in vitro* bioassay and air sampling capabilities. The documents should include guidance for calibration/QC and use of whole body counter (WBC); release of contaminated individuals, use of passive monitoring as screening method for evaluations, and special *in vitro* sample collection and analysis, and actions for declared pregnant workers
2. National Voluntary Laboratory Accreditation Program (NVLAP) accreditation documentation for current dosimetry used by the site.
3. List of all personal contamination events involving skin dose assessments and individual positive WBC results, *in vitro*, or air sampling analyses which resulted in an assigned CEDE equal to, or exceeding, 10 millirem since October 1, 2020. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for in-depth review during the onsite inspection].*
4. Highest 10 TEDE doses received by individuals in 2020, 2021 and year to date.
5. List of SDE exposures >500 mrem in 2020, 2021 and year to date
6. List of neutron exposures >50 mrem in 2020, 2021 and year to date
7. List of condition reports (e.g. NCRs, CRs, ARs etc.) generated since September 1, 2020, for internal or external dosimetry issues/events. *[Note: only titles and a summary statement should be provided for use by the inspectors to select a sample of issues for in-depth review].*

#### **71124.05 - Radiation Monitoring Instrumentation**

(Last Inspected October 2020)

1. Procedures/Guidance Documents for:
  - use of portable instrument calibrators (e.g. Shepherd calibrator)
  - calibration and functional test/source checks of portable radiation detection instrumentation
  - calibration and functional tests of small article monitor (SAM), personnel contamination monitor (PCM), portal monitor (PM), whole body counting (WBC) equipment; and continuous air monitors (CAMs)
  - determination of set-points for Area Radiation Monitor (ARM), CAM, PCM, PM and SAM equipment
  - collection and analysis of high-range, post- accident effluent samples
  - QA program for count room instruments (e.g. laboratory inter-comparison data)

2. The last two calibration records for Unit 1 High Range Containment Monitors and Unit 1 Vent Monitor channels (Particulate, Iodine and Noble Gas).
3. The last two calibration records for Liquid Effluent Monitor R-18
4. Documentation for the radioactive sources used to calibrate the instruments in items 2 and 3 above, including paperwork showing traceability to a National Institute of Standards & Technology standard and/or traceability to the primary calibration, as applicable
5. The last two test records of the instrument calibrator (Shepherd validation testing/dose rate curves).
6. The last two records of calibration for the WBC.
7. List of the portable instruments currently in service and available for use. Several will be selected for on-site review of the calibration records.
8. List of the following radiation monitors currently in service. Several will be selected for on-site review of the calibration records.
  - Portal Monitors used in Dosimetry for Passive Monitoring
  - SAMs at RCA exit point
  - Whole Body Contamination Monitors at RCA exit point
  - Portal Monitors at RCA exit point
  - Countroom High-purity Germanium and liquid scintillation systems
9. Source certificates/documentation for the radioactive sources used to calibrate the monitors requested for item 7 above showing NIST traceability.
10. Chart or procedure listing any EAL value associated with installed or portable radiation monitoring instrument indication(s).
11. List of condition reports (e.g. NCRs, CRs, ARs etc.) generated since October 1, 2020, related to portable instruments, area radiation monitors, CAMs, WBCs, and count room instruments. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

#### **71151 – Performance Indicator (PI) Verification**

(Last Inspected April 2021)

1. Site procedures/manuals for gathering and reporting PI data.
2. Monthly/Quarterly PI reports since April 1, 2021, and copies of associated corrective action reports for any RETS/ODCM Radiological Effluent occurrences.
3. List of all corrective action documents since April 1, 2021, using keywords such as: HRA, LHRA, VHRA, unintended dose, unlocked door, etc.
4. List of all electronic dosimeter (ED) dose rate alarms and ED dose alarms since April 1, 2021 which includes dose or dose rate alarm received, and the alarm setpoint(s).
5. List of condition reports (e.g. NCRs, CRs, ARs etc.) generated since April 1, 2021 using keywords abnormal/ unmonitored effluent release, etc.

#### **Assistance Requested During On-Site Inspection**

- Identification of work activities available during the inspection for inspector observations, including notification of pre-job briefings, notification of risk significant work activities, and audio/visual surveillance for remote job coverage

- HP assistance in plant walk-downs assessing access controls, e.g. verifying the posting and locking of entrances to LHRAs, VHRAs and SFP controls.
- HP assistance in plant walk-downs/job coverage of ongoing activities to assess access controls.
- Coordination of observations of source checks of fixed and portable instruments.

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