

From: [Adam Nielsen](#)
To: Thomas.Sherrill3@duke-energy.com
Cc: [Jack Bell](#)
Subject: Document request for RP inspection at Brunswick inspection report 2023-01
Date: Tuesday, January 17, 2023 1:11:00 PM
Attachments: [Brunswick doc request RPinspection 23-01.pdf](#)

Please see the attached document request for our upcoming RP inspection scheduled for February 13 – 17, 2023. Note that some of the items may be outside RP's purview, so coordination with other groups might be required (e.g. ventilation testing records, etc.).

We would like to have the documents available by February 6, 2023. However, if you run into difficulty and need more time for certain items, just let us know and we can work with you.

Please call me with any questions.

Thanks,
Adam Nielsen
Senior Health Physicist
US NRC Region II
(404) 997-4660

Brunswick Steam Electric Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2023001

During the week of February 13 - 17, 2023, the U.S. Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at the Brunswick Steam Electric Plant (NRC Inspection Procedures 71124.01, 71124.03, and 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 February 6, 2023.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Adam Nielsen at 404-997-4660, 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/readingrm/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
Occupational Radiation Safety Cornerstone

Brunswick Licensing Contact: Thomas Sherrill (910) 832-2703
thomas.sherrill3@duke-energy.com
Inspection Dates: February 13 - 17, 2023
Documents Due to Region II by: February 6, 2023

NRC Inspection Procedures (IPs):

71124.01 - Radiological Hazard Assessment and Exposure Controls
71124.03 - In-Plant Airborne Radioactivity Control and Mitigation
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 and if possible, use a descriptive name for the files provided. If there are questions regarding the documents requested, or method of transfer, please do not hesitate to contact the lead inspector.

Documentation for inspection procedures 71124.01 and 71151 should be from March 4, 2022 to present. Documentation for inspection procedure 71124.03 should be from April 2, 2021 to present. These dates are approximate to the last time these inspections were conducted. Also, provide only a listing and title for CRs 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 Adam Nielsen at 404-997-4660. Thank you in advance for your effort in putting together this material.

General and Miscellaneous Information

1. List of primary site contact(s) for each inspection area including name(s), e-mail and telephone numbers.
2. Corrective Action Program procedures.
3. Schedule of major outage maintenance/work activities during the week of the inspection (Gantt chart if available).

71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last inspected on March 4, 2022)

1. List of Radiation Work Permits (RWPs) (including their dose and dose rate limits), for the upcoming outage.
2. Site and Corporate procedures related to Radiation Protection (RP) controls (e.g., posting, labeling, surveys, RWPs, contamination control, high radiation area (HRA)/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.)
3. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow-up, etc.)
4. List of non-fuel items stored in spent fuel pool.
5. Most recent 10 CFR 61 analysis for the Dry Active Waste (DAW) waste stream.
6. ALARA work plans for the top 3 highest dose jobs for the upcoming outage.
7. ALARA report from the previous refueling outage.

8. Most recent self-assessment or audit covering RP controls.
9. List of CRs related to RP controls (e.g., radworker error, HP technician error, posting issues, radioactive source controls, HRA/LHRA/VHRA issues, survey problems, etc.) generated since March 4, 2022. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation
(Last Inspected on April 2, 2021)

1. Procedures related to airborne monitoring and control (e.g. use of purge systems, use of portable HEPA/charcoal units, temporary ventilation enclosures, use of CAMs, air sampling guidance, alpha air sampling, etc.), as applicable.
2. Procedures related to the use of respiratory protection devices, (e.g. SCBA, TEDE-ALARA guidance, PAPRs, storage, maintenance, training, QA, fit-testing, etc.)
3. Copy of the last 2 grade D air testing certificates for each supplied air system and SCBA filling station.
4. Documentation of the last 2 surveillances performed on SCBAs available for emergency use (typically monthly).
5. Two most recent HEPA filter DOP and charcoal test results for the Control Room Emergency Ventilation (CREV) System, all trains (typically every 18-months).
6. Most recent audit or self-assessment covering airborne controls and respiratory protection
7. List of CRs related to airborne monitoring and respiratory protection since April 2, 2021. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.
8. SCBA qualification records:
 - a) List of all licensed operators qualified to wear an SCBA
 - b) List of all RP personnel qualified to wear an SCBA

71151 – Performance Indicator Verification (Occupational Radiation Safety Cornerstone Only)

1. Procedure(s) for gathering and reporting PI data.
2. List of all CRs related to LHRA/VHRA issues or significant unintended doses since March 4, 2022. This should be a list of corrective action documents containing a CR number and brief description, not full CRs.
3. List of electronic dosimeter alarms since March 4, 2022 (dose and dose rate).

Inspector Contact Information:

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