UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

August 22, 2023

EA-23-076

Kelly Trice
President
Holtec Decommissioning International, LLC
Krishna P. Singh Technology Campus
1 Holtec Boulevard
Camden, NJ 08104

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, OYSTER CREEK NUCLEAR GENERATING STATION – NRC INSPECTION REPORT NO. 05000219/2023002

Dear Kelly Trice:

On June 30, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection under Inspection Manual Chapter 2561, "Decommissioning Power Reactor Inspection Program," at the permanently shut down Oyster Creek Nuclear Generating Station (Oyster Creek). The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs. The results of this inspection were discussed with Jeffrey Dostal, Site Vice President, and other members of your staff on July 11, 2023, and are described in the enclosed report.

Based on the results of this inspection, an apparent violation (AV) was identified and is being considered for escalated enforcement action, including a civil penalty, in accordance with the NRC Enforcement Policy. The current Enforcement Policy is available on the NRC's Web site at http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The AV involves the failure by Holtec Decommissioning International, LLC (HDI) staff at Oyster Creek to design and prepare radioactive materials for shipment so that under conditions normally incident to transportation the radiation level does not exceed 200 mrem/hr at any point on the external surface of the package, as required by Title 49 of the *Code of Federal Regulations* (49 CFR) 173.441. Pursuant to 10 CFR 71.5, licensees who transport licensed materials on public highways must comply with the requirements of the U.S. Department of Transportation regulations in 49 CFR Parts 170 through 189.

Before the NRC makes its enforcement decision, you may provide a written response to the NRC regarding the AV and HDI's corrective actions. The written response should include: (1) the reason for the AV or, if contested, the basis for disputing the AV; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

If you choose to provide a written response, it should be sent to the NRC within **30** days of the date of this letter. You should clearly mark the response as a "Response to Apparent Violation

in NRC Report No. 05000219/2023002; EA-23-076," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, NRC Region I, 475 Allendale Road, Suite 102, King of Prussia, PA 19406-1415. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a pre-decisional enforcement conference (PEC).

In lieu of providing a written response, you may choose to provide your perspective on this matter, including the significance, cause, and corrective actions, as well as any other information that you believe the NRC should take into consideration, by requesting a PEC to meet with the NRC and provide your views in person.

If you choose to request a PEC, the meeting should be held within 30 days of the date of this letter. The conference will include an opportunity for you to provide your perspective on these matters and any other information that you believe the NRC should take into consideration before making an enforcement decision. The decision to hold a PEC does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference would be conducted to obtain information to assist the NRC in making an enforcement decision. The topics discussed during the PEC may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned. If a PEC is held, it will be open for public observation and the NRC will issue a press release to announce the time and date of the conference.

In presenting your corrective actions in a written response or at a PEC, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the AV. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," at https://www.nrc.gov/docs/ML0612/ML061240509.pdf, may be helpful.

Finally, in lieu of a PEC, you may also request Alternative Dispute Resolution (ADR) mediation with the NRC in an attempt to resolve this issue. ADR is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation; a voluntary, informal process in which a trained neutral mediator works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues. Additional information concerning the NRC ADR program can be obtained at http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html . The Institute on Conflict Resolution (ICR) at Cornell University has agreed to facilitate the NRC program as a neutral third party. Please contact ICR at 877-733-9415 within 10 days of the date of this letter if you are interested in pursuing resolution of this issue through ADR. The ADR mediation session should be held within 45 days of the date of this letter.

Please contact Anthony Dimitriadis, Chief, Decommissioning, ISFSI, and Reactor Health Physics Branch, NRC Region I, at 610-337-6953 within **10** days of the date of this letter to notify the NRC of which of the above options you choose. If you do not contact the NRC within the time specified, and an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision.

In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system Agencywide Document Access and Management System (ADAMS), accessible from the NRC website at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Radioactive Waste; Decommissioning of Nuclear Facilities**; then **Regulations**, **Guidance and Communications**. The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy** (Under 'Related Information'). You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Please contact Andrew Taverna of my staff at 610-337-5119 if you have any questions regarding this matter.

Sincerely,

Paul G. Krohn

Digitally signed by Paul G. Krohn
Date: 2023.08.22 10:49:49 -04'00'

Paul G. Krohn, Director
Division of Radiological Safety and Security

Docket No: 05000219
License No: DPR-16

Enclosure: Inspection Report 05000219/2023002
w/Attachment

cc w/encl: Distribution via ListServ

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, OYSTER CREEK NUCLEAR GENERATING STATION – NRC INSPECTION REPORT NO. 05000219/2023002 DATED AUGUST 22, 2023

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DOCUMENT NAME: https://usnrc.sharepoint.com/teams/Region-I-Decommissioning-Branch/Inspection Reports/Inspection Reports - Draft/OC_2Q2023_draft.docx
SUNSI Review Complete: A. Taverna **ADAMS ACCESSION NO. ML23214A247**
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OFFICE	RI: DRSS	RI: ORA	RI: DRSS	RI: ORA	RI: ORA
NAME	ATaverna	MMcLaughlin	ADimitriadis	RSusko NLO	JNick
DATE	08/02/2023	08/21/2023	08/03/2023	08/03/23	08/21/23
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DATE	08/15/2023	08/15/2023	08/15/2023	08/22/23	

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U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No:	050-00219
License No:	DPR-16
Report No:	05000219/2023002
Licensee:	Holtec Decommissioning International, LLC
Facility:	Oyster Creek Nuclear Generating Station
Location:	Forked River, New Jersey
Dates:	January 1, 2023 – June 30, 2023
Inspectors:	A. Taverna, Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
	K. Warner, CHP, Senior Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
	R. Turtil, Senior Financial Analyst, Financial Assessment Branch Division of Rulemaking, Environmental, and Financial Support Office of Nuclear Material Safety and Safeguards
Approved by:	Anthony Dimitriadis, Chief Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security

Enclosure

EXECUTIVE SUMMARY

Holtec Decommissioning International, LLC (HDI)
Oyster Creek Nuclear Generating Station
NRC Inspection Report No. 05000219/2023002

A routine, announced decommissioning inspection was completed on June 30, 2023, at the permanently shut down Oyster Creek Nuclear Generating Station (OC). A combination of on-site and remote inspection activities were performed over the inspection period. On-site inspection activities were conducted on May 22, and June 26 - 29, 2023. The inspection included safety reviews, design changes, and modifications at permanently shutdown reactors, problem identification and resolution, decommissioning performance, and status reviews; occupational radiation exposure; and solid radioactive waste management and transportation of radioactive materials. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs. The U.S. Nuclear Regulatory Commission's (NRCs) program for overseeing the safe decommissioning of a shutdown nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Apparent Violation

One apparent violation was identified for HDI's failure to properly prepare and ship a package containing radioactive material in a manner that assured, under conditions normally incident to transport, conformance with U.S. Department of Transportation (DOT) radiation level limitations specified by Title 49 of the *Code of Federal Regulations* (49 CFR) 173.441 on any external surface of the package. Specifically, inadequate radiological surveys performed at OC indicated that the package conformed with DOT limits. However, when the shipment arrived at Indian Point Energy Center (IPEC) on May 3, 2023, the maximum radiation dose rate on the external surface of the package (topside) was measured as 450 millirem per hour (mrem/h), exceeding the DOT limit of 200 mrem/h.

REPORT DETAILS

1.0 Background

On September 25, 2018, Oyster Creek certified the permanent removal of fuel from the reactor vessel (Agencywide Document Access and Management System (ADAMS) Accession No. ML18268A258). This met the requirements of 10 CFR 50.82(a)(1)(i) and 50.82(a)(1)(ii). On October 1, 2018, the NRC notified the licensee that the Operating Reactor Assessment Program had ceased, and that implementation of the Decommissioning Power Reactor Inspection Program would begin on October 1, 2018 (ADAMS Accession No. ML18274A221). On July 1, 2019, an amended license was issued transferring the license from Exelon Generation Co., LLC to Holtec Decommissioning International, LLC (ADAMS Accession No. ML19164A157). OC is currently in the "Actively Decommissioning, No Fuel in the Spent Fuel Pool" (SFP) phase of decommissioning as described in IMC 2561.

2.0 Active Decommissioning Performance and Status Review

2.1 Inspection Procedures 37801, 40801, 71801, 83750

a. Inspection Scope

The inspectors performed on-site decommissioning inspection activities on May 22, and June 26 – 29, supplemented by in-office reviews and periodic phone calls during the inspection period. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs.

The inspectors assessed the implementation and effectiveness of HDI's corrective action program (CAP) for OC by reviewing a sampling of issues, and conditions adverse to quality entered in the CAP.

The inspectors attended select management meetings, including station oversight committee and management review committee meetings. Inspectors reviewed documentation and met with OC management to discuss staffing, status of decommissioning and upcoming activities to determine if HDI had conducted activities in accordance with regulatory requirements. The inspectors performed several plant walk-downs to assess field conditions and decommissioning activities by evaluating material condition of structures, systems, and components; housekeeping; system configurations; and worker level of knowledge and procedure use and adherence. These walk-downs included the new radwaste building, reactor building, Low Level Rad Waste Storage Facility (LLRWSF), and the Radiologically Controlled Area (RCA). Additionally, the inspectors observed select pre-job briefings and associated work activities, including but not limited to spraying contaminant fixative to the walls of the SFP and movement of a liner containing used filters.

The inspectors observed activities, reviewed documentation, and interviewed personnel associated with occupational radiation exposure to evaluate the licensee's protection of worker health and safety as well as the staffing of the radiological protection department. The inspectors conducted site walk-downs, including radiologically controlled areas, to examine and verify radiological postings, and airborne and contamination controls. The inspectors reviewed radiation work permits (RWP's) and As Low As Reasonably

Achievable (ALARA) work plans to determine if radiation work activities were pre-planned effectively to limit worker exposure. Inspectors also attended various briefings where radiological and industrial safety during work activities were discussed. The inspectors observed radiation protection (RP) staff perform work activities. The inspectors observed the RP coverage during the following work activities: (1) lifting and movement of the liner and (2) spray painting contaminant fixative in the SFP. Additionally, the inspectors observed staff donning and doffing protective clothing and using portal exit monitors out of the RCA. During the inspector's walk-down of the reactor building and new radwaste building, a sample of instruments was checked for their condition and calibration.

The inspectors reviewed documentation and interviewed personnel associated with safety reviews, design changes, and modifications. The review included the site's safety review process and procedures for identifying changes to technical specifications, determining if the site had appropriate level of staffing and training for its safety review process, and a review of design basis documents for consistency with design changes made at the site. Additionally, a sample of design changes and screenings was reviewed.

The inspectors reviewed documentation and discussed with HDI the overall financial status of decommissioning for OC and evaluated the use of decommissioning trust funds to determine if they were appropriately used in accordance with regulatory requirements. The inspectors also discussed any significant changes to the estimated cost for, and any potential significant delays to, the decommissioning schedule.

b. Observations and Findings

The inspectors determined that issues had been identified, entered into the CAP, and evaluated commensurate with their safety significance through document review, interviews, and observation of several management review committee and station oversight committee meetings.

The inspectors noted that during this inspection period, the site continued decommissioning and dismantlement activities in the new radwaste building. The inspectors noted that for the areas of the plant toured, the material condition and housekeeping was adequate. The inspectors determined through plant tours, document reviews, and observations of activities that HDI conducted activities in accordance with the regulatory requirements. The inspectors noted that workers were knowledgeable of and adhered to plant procedures and work plans, and pre-job briefings were thorough and highlighted specific safety concerns.

The inspectors verified that the RWPs, ALARA work plans, and micro-ALARA plans were implemented to limit worker exposure. The inspectors determined that RP staff effectively controlled observed work activities and used appropriate equipment during those work activities. Inspectors noted during the liner movement, the RP personnel conducted continuous instrument dose rate measurements, had effective communication for individuals to move to low dose areas, and had proper controls during the movement such as postings and guards were appropriate in identifying the magnitude and extent of the radiological hazard. The licensee plans for the work were commensurate with the risk of the work and associated hazards. The inspectors verified that selected instruments during walk-downs were in calibration and in working condition.

The inspectors determined that screenings and design changes were properly performed in accordance with the site's safety review process and procedures and in accordance with 10 CFR 50.59. The inspectors determined the licensee's safety review process committee was appropriately staffed and had a training program consistent with site requirements. Inspectors determined design basis documents were appropriately consistent with design changes.

The inspectors reviewed financial assurance documentation, including HDI's annual report on the status of decommissioning funding and met with HDI staff to determine whether the funds were used as expected and if any changes could significantly impact the site's decommissioning financial assurance. The inspectors noted that the annual report included a notification of schedule change in accordance with 10 CFR 50.82(a)(7). This schedule change related to a delay of activities and partial site release but did not impact the milestones for the overall scheduled license termination dates. An open item was initiated to track the NRC's continued review of sampled withdrawals from the decommissioning trust funds to determine if such withdrawals were in accordance with regulatory requirements **(Open Item 05000219/2023002-01), Continued review of decommissioning trust fund withdrawals**).

c. Conclusions

No violations of more than minor safety significance were identified.

2.2 Inspection Procedure 86750, "Solid Radioactive Waste Management and Transportation of Radioactive Materials"

a. Inspection Scope

On May 22, 2023, the inspectors reviewed activities and documentation, performed site walk-downs, and observed work activities associated with the possession, processing, storage, and shipment of licensed radioactive material.

The inspectors performed a focused review of the circumstances surrounding a May 3, 2023, radioactive material shipment (Shipping Manifest Number OC-23-0208) from OC to IPEC. The radioactive material shipment (two packages via an 'Exclusive Use' open transport vehicle) was received at IPEC on May 3, 2023. Upon receipt, one of the packages, which contained contaminated equipment (a Class B/C waste alignment fixture), was found to have radiation levels on the external surface (topside) in excess of the DOT radiation limit for external surface of packages shipped by 'Exclusive Use' open transport vehicles, as specified in 49 CFR 173.441. Specifically, 49 CFR 173.441 limits the radiation level on the surfaces of such packages to 200 mrem/h. When received at IPEC, the radiation level on the surface of one of the packages was measured as 450 mrem/h. Upon identification, HDI documented the issue in its CAP as OYS-03315.

During an inspection at IPEC May 16 - 18, 2023, the inspectors witnessed the as-received condition of the OC shipment in the Unit 3 vapor containment. The inspectors observed the conduct of radiological surveys of the package conducted by IPEC RP personnel, and the radiological controls implemented to open and examine the package contents. In addition, the inspectors reviewed shipping documentation, including all receipt surveys conducted by IPEC personnel.

b. Observations and Findings

The inspectors performed walk-downs of several radioactive materials storage areas, including the LLRWSF and RCA yard, and determined that radioactive material was adequately stored, and the areas were posted in accordance with regulatory requirements. The inspectors observed portions of radiological surveys for an outgoing shipment and determined that RP staff performed their surveys in accordance with site procedures. The inspectors noted that no abnormal dose rates were identified.

Apparent Violation

One apparent violation was identified for HDI's failure to properly prepare and ship a package containing radioactive material in a manner that assured, under conditions normally incident to transport, conformance with DOT radiation level limitations specified by 49 CFR 173.441, i.e., 200 mrem/h on any external surface of the package. Inadequate radiological surveys were performed at OC that indicated that the package conformed with the DOT regulatory requirements. However, when the shipment arrived at IPEC on May 3, 2023, the maximum radiation dose rate on the external surface of the package (topside) was measured as 450 mrem/h.

On May 3, 2023, HDI shipped reactor segmentation tooling (a Class B/C waste alignment plate) to IPEC as Low Specific Activity Category II (i.e., LSA-II) material using *Exclusive Use* controls in an open transport vehicle. The segmentation tooling was packaged in an Industrial Package Type IP-1 package (i.e., a polyethylene bag). The radiation survey used to verify that the contact dose rates on the loaded package were under regulatory limits was performed on the packaged tool prior to the package being strapped down in its final shipping configuration. The April 28, 2023, survey documented in the shipping package identified a maximum contact dose rate of 120 mrem/h. Upon receipt, on May 3, 2023, IPEC's initial radioactive survey identified a maximum contact dose rate of 450 mrem/h on top of the package. A confirmatory survey of the package was performed by IPEC personnel on May 4, 2023, which identified maximum contact dose rates of 215 and 555 mrem/h at two separate spots on top of the package.

The inspectors noted that the OC procedures did not require that a final shipping survey be conducted when the package was in its final shipping configuration prior to shipment. A note in Section 5.3.1 of OC procedure RP-AA-601, Surveying Radioactive Material Shipments, Revision 21, states: "Survey data obtained during package survey(s) may be used when appropriate for vehicle surveys to reduce re-surveying activities." HDI's apparent cause evaluation documented that the lack of adequate procedural guidance, especially for soft-sided packages, as well as a lack of questioning attitude, resulted in a failure to alert workers of potential geometry changes contributing to this event.

Title 10 CFR 71.5 requires each licensee who transports licensed materials on public highways to comply with the requirements of the DOT regulations in 49 CFR Parts 170 through 189. Title 49 CFR 173.441 requires that each package of radioactive material offered for transportation, including those transported by '*Exclusive Use'* shipment in an open transport vehicle, be designed and prepared for shipment so that, under conditions normally incident to transportation, the radiation level does not exceed 200 mrem/h at any point on the external surface of the package.

Contrary to the above, on May 3, 2023, HDI failed to design and prepare a package of radioactive material offered for transportation such that, under conditions normally incident to transportation, the radiation level did not exceed 200 mrem/h at any point on the external surface of the package. Specifically, the licensee shipped a package containing radioactive material using *Exclusive Use* controls in an open transport vehicle. When the shipment arrived at IPEC, radiation levels of 450 mrem/h were measured on top of the external surface of the alignment fixture package during the receipt survey, exceeding the regulatory requirement of 200 mrem/h.

Upon identification, OC documented the condition in issue report OYS-03315; completed an apparent cause evaluation (ACE-OYS-003315); and identified corrective actions. These included several procedure revisions to evaluate the potential for soft-sided package geometry to be changed during the shipping process and to require a verification shipping survey when the package has been secured to the trailer in its final configuration prior to transport. Additional corrective actions include a training or briefing on soft-sided package geometry considerations to be provided to both drivers and staff associated with shipping activities, as well as distributing a communication to workers at all HDI sites to strengthen shipping communications. Pending final significance determination, this violation is identified as an apparent violation, **(AV 05000219/2023002-02, Radioactive Material Shipment Package Dose Rate Exceeded.)**

c. Conclusions

One apparent violation was identified that is being considered for escalated enforcement.

3.0 Exit Meeting

On July 11, 2023, the inspectors presented the inspection results to Jeffrey Dostal, Site Vice President, and other members of the Oyster Creek staff. No proprietary information was retained by the inspectors or documented in this report.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Oyster Creek Personnel
J. Dostal, HDI Oyster Creek Site Vice President
S. Johnson, Site Licensing Manager
W. Straka, Project Manager
M. Hassler, Decommissioning Manager
K. Leonard, Waste Controls Manager
J. Sisak, Decommissioning Facility Manager
M. Carlson, Site Engineering Manager
E. O'Brian, Environmental Spec/Safety
K. Wolf, Radiation Protection, Chemistry, and Environmental Manager
F. Miranda, Shipping Specialist
K. Zadroga, Radiation Protection, Chemistry Supervisor

ITEMS OPENED, CLOSED, AND DISCUSSED

05000219/2023002-01	Open Item	Continued review of decommissioning trust fund withdrawals
05000219/2023002-02	AV	Radioactive Material Shipment Package Dose Rate Exceeded

PARTIAL LIST OF DOCUMENTS REVIEWED

Condition Reports

OYS-03315, OYS-03349, OYS-03350, OYS-03351, OYS-03353, OYS-03321, OYS-03354, OYS-03352, OYS-03355, OYS-03356, OYS-03357, OYS-03358, OYS-03359, OYS-03360, OYS-03361, OYS-03362, OYS-03364, OYS-03363, OYS-03365, OYS-03408, OYS-03388, OYS-03389, OYS-03315-04

Miscellaneous

Apparent Cause Evaluation for OYS-03315, Radioactive Shipment to Indian Point Energy Center (IPEC) found to have radiation measurements on contact with the packages above the Shipping Limit, June 8, 2023
Shipping Package, OC-23-0208
TQ-DC-105-F020, Trainee Course/Qualification Selection and Course Attendance Sheet, Revision 7
101.2 R82, LS-DC-128-F-01, Fire Protection Change Regulatory Review, Revision 0
101.2 R82, AD-AA-101-F-01, Document Site Approval Form, Revision 7
OC-2022-EC-0005, LS-AA-104-1001, 50.59 Review, Revision 4
OC-2022-S-0001, LS-AA-104-1003, 50.59 Screening Form, Revision 4
OC-2020-EC-0010, LS-AA-104-1001, 50.59 Review, Revision 4
OC-2023-S-0002, LS-AA-104-1003, 50.59 Screening Form, Revision 4
Revised Post-Shutdown Decommissioning Activities Report
Revised Site-Specific Decommissioning Cost Estimate

Procedures
RP-AA-600, Radioactive Material Waste Shipments, Revision 18
RP-AA-601, Surveying Radioactive Material Shipments, Revision 21
RP-AA-602, Packaging of Radioactive Material Shipments, Revision 21
RP-AA-603, Inspection and Loading of Radioactive Material Shipments, Revision 10
ALARA Plan Number 23-905_SFP, RP-AA-401, Micro-ALARA Plan, Revision 26

Radiological Surveys
YLA-23-907
IPEC survey 023-2-2281 and 023-2-2273
RH3-23-541
RH3-23-241
RH3-23-1181
RH3-23-1229
RH3-23-1216
RH3-23-1259
RH3-23-1260
RH3-23-1261
RH3-23-1271
RH3-23-563
RH3-23-365
RH3-23-442
RH3-23-502
RH3-23-249
RH3-23-1282

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
ADR	Alternative Dispute Resolution
ALARA	As Low As Reasonably Achievable
AV	Apparent Violation
CAP	Corrective Action Program
CFR	*Code of Federal Regulations*
DOT	U.S. Department of Transportation
DQAP	Decommissioning Quality Assurance Program
GPO	Government Printing Office
HDI	Holtec Decommissioning International, LLC
ICR	Institute on Conflict Resolution
IMC	Inspection Manual Chapter
IPEC	Indian Point Energy Center
LLRWSF	Low Level Rad Waste Storage Facility
NRC	U.S. Nuclear Regulatory Commission
Oyster Creek	Oyster Creek Nuclear Generating Station
RCA	Radiologically Controlled Area
RP	Radiation Protection
RWP	Radiation Work Permits
SFP	Spent Fuel Pool