

November 9, 1999

MEMORANDUM TO: Thomas H. Essig, Chief  
Emergency Preparedness and  
Health Physics Section, IOLB  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: Charles S. Hinson, Health Physicist  
Emergency Preparedness and  
Health Physics Section, IOLB  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING WITH NUCLEAR INDUSTRY  
REPRESENTATIVES REGARDING PERFORMANCE INDICATORS  
AND THE SIGNIFICANT DETERMINATION PROCESS IN THE AREA  
OF OCCUPATIONAL RADIATION SAFETY

On October 26, 1999, Ralph Anderson from the Nuclear Energy Institute (NEI) met with representatives of the Nuclear Regulatory Commission (NRC) at NEI offices in Washington, DC. Attachment 1 provides a list of attendees.

The primary purpose of the meeting was to discuss possible modifications to the Occupational Radiation Safety PIs and SDP flowcharts based on the feedback received to date from the inspection pilot program. Mr. Anderson suggested that NEI would be studying the feedback from the pilot plants to evaluate the adequacy of the current values for the PI period and threshold. He also discussed the need for establishing a threshold definition for findings so that some minor findings would drop out of the SDP and not end up being classified as Green findings. The NRC and NEI members present also discussed comments from industry concerning the adequacy of the Occupational Radiation Safety inspection procedures. Attachment 2 contains a more detailed description of the topics discussed at the meeting.

CONTACT: Charles S. Hinson EPHP/IOLB/NRR  
415-1845

Attachments: As stated

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

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Attachment As stated  
Project No. 689

**Occupational Radiation Safety PI/SDP Meeting  
10/26/99**

**List of Attendees**

<b><u>Name</u></b>	<b><u>Organization</u></b>
R. Anderson	NEI
C. Hinson	NRC/NRR
R. Pedersen	NRC/NRR
T. Essig	NRC/NRR

## OVERVIEW OF OCTOBER 26, 1999 STAFF MEETING WITH NEI

Topic: To discuss possible changes to the Occupational Radiation Safety PIs and SDP

The above participants met at NEI Headquarters at 9:00 a.m. on October 26, 1999 to discuss possible modifications to the Occupational Radiation Safety PIs and SDP based on the feedback received to date from the pilot program.

Currently, a licensee can accumulate up to six PIs over a period of 12 calendar quarters before the NRC will conduct a special inspection to discuss corrective actions. Based on feedback from the pilot program, some licensees believe that the PI period should be shortened while keeping the six PI threshold. All of the PIs identified at the pilot plants are to be verified by January 17, 2000. Once all of this information has been submitted, NEI will study the feedback from the pilot plants and evaluate the adequacy of the current values for the PI period and threshold. NEI will complete this evaluation prior to April, 2000, when the new inspection program is implemented.

We discussed the possible need for an ALARA PI. NEI reported that most comments on the ALARA SDP have been positive and therefore there may be no need for an ALARA PI. If an ALARA PI were to be developed, it would probably look very similar to the current ALARA SDP.

The need for "front end" screening of minor findings was discussed. Currently, a licensee program with one or more White or Yellow findings will receive much more NRC scrutiny than a plant with one or more Green findings. Likewise, a licensee program with multiple Green findings may receive more public scrutiny than a licensee program with a single Green finding, even though both are Green. Mr. Andersen stated that the NRC needs to define the purpose of documenting a Green finding so that findings that don't fall under this definition will not even be entered into the SDP (and therefore not be categorized as Green findings). Mr. Pedersen noted that such a "front end" screen should be defined in a generic document such as MC 0610 and not in the SDP. Another method of not capturing certain minor findings as Green findings would be to add some "trap doors" in the SDP itself (such as is done in the ALARA and EP SDPs). Mr. Anderson stated that NEI will propose changes in this area during a November meeting with the NRC.

There was some discussion as to the need to clarify the difference between a PI hit and a finding significant enough to trigger entry into the SDP. The group also discussed several minor changes to the Occupational Radiation Safety SDP, including the removal of the "unintended exposure" box in the SDP.

Mr. Pedersen mentioned that the inspection procedure on Occupational Radiation Safety (71121) needs to be modified to include a section on dosimeter processing. Mr. Hinson mentioned that several HP inspectors had expressed concern that certain effluent radiation monitors covered by the Maintenance Rule are not covered by this procedure. Mr. Anderson said that this should not be of concern. He stated that the Maintenance Rule is a risk informed

rule, takes into account industry experience, and, therefore, these effluent monitors should receive comprehensive inspection by the NRC regional inspectors inspecting against the maintenance rule. Mr Anderson did not advocate making any changes to the inspection procedures in this area.

There have been several industry comments concerning minor modifications or clarifications to elements of the ALARA SDP. One comment from industry concerned the use of a five-year instead of a three-year period for averaging occupational dose. The basis of this comment is that using a five-year averaging period for collective doses would provide a smoother dose curve and serve to dampen out some of the year-to-year fluctuations caused by high collective dose outage years. The use of a five-year averaging period, however, would also dampen the affect of low dose years resulting from ALARA improvements. NEI pointed out that the definition a "job", as referenced in the ALARA SDP, needed to be better defined. Some plants have classified the entire outage as a single job, while others have broken tasks into small subsets and classified each of these as jobs.

Before adjourning the meeting, we discussed how questions generated from the pilot program will be addressed. The staff will address questions concerning the SDP and inspection program while NEI will address questions on PIs.

The next meeting between the NRC and NEI will take place in mid November. In December, 1999, NEI will host a workshop with industry to discuss the implementation of lessons learned from the pilot program.