RAI Admin §5 #3:

The applicant did not provide details of its qualification program for designees approving Radiation Work Permits (RWPs) and Standing Radiation Work Permits (SRWPs) in the absence of the RSO. In TR Section 5.2.1.2, the applicant stated that qualified designees will review and approve RWPs and SRWPs in the absence of the RSO, but did not provide any description of its qualification program for such designees. Please provide a description of the qualifications of the designees that will be allowed to review and approve RWPs and SRWPs in the absence of the RSO.

RAI Admin §5 #3 Response (10/17/14):

Section 5.2.1.2 has been revised to present the qualifications and training for HPT's to review and approve RWPs and SRWPs in the absence of the RSO.

5.2.1.1 Operating Procedures

CBR has developed procedures consistent with the corporate policies, standards, and regulatory requirements to implement these management controls. The SHEQMS consists of the following standards and operating procedures contained in eight volumes:

Volume 1 – *Standards*
Volume 2 – *Management Procedures*
Volume 3 – *Operating Manual* (SOPs)
Volume 4 – *Health Physics Manual*
Volume 5 – *Industrial Safety Manual*
Volume 6 – *Environmental Manual*
Volume 7 – *Training Manual*
Volume 8 – *Emergency Manual*

Written operating procedures have been developed for all process activities including those involving radioactive materials. Where radioactive material handling is involved, pertinent radiation safety practices are incorporated into the operating procedure. Additionally, written operating procedures have been developed for non-process activities including environmental monitoring, health physics procedures, emergency procedures, and general safety.

The procedures enumerate pertinent radiation safety procedures to be followed. A copy of the written procedure will be kept in the area where it is used. All procedures involving radiation safety will be reviewed and approved in writing by the RSO or another individual with similar qualifications prior to being implemented. The RSO will also perform a documented annual review of the operating procedures.

5.2.1.2 Radiation Work Permits

When employees are required to conduct activities of a non-routine nature where there is the potential for significant exposure to radioactive materials and for which no operating procedure exists, an RWP will be required. The RWP will describe the scope of the work, precautions necessary to maintain radiation exposures to ALARA, and any supplemental radiological monitoring and sampling to be conducted during the work. The RWP shall be reviewed and approved in writing by the RSO or qualified ~~designated~~ HPT in the absence of the RSO prior to initiation of the work. The HPT is instructed to assess the complexity of the activity and to contact the RSO by phone if any questions arise.

To become qualified ~~designated~~, the HPT must meet the technical qualifications as described in RG 8.31 and demonstrate competency by preparing a minimum of six RWP's under the supervision of the RSO. Continued proficiency will be demonstrated by preparing a minimum of two RWP's annually under the supervision of the RSO. The RSO will document the competency and proficiency of the HPT. ~~determination.~~

The RSO may also issue Standing Radiation Work Permits (SRWPs) for periodic tasks that require similar radiological protection measures (e.g., maintenance work on a specified facility system). The SRWP will describe the scope of the work, precautions necessary to maintain radiation exposures to ALARA, and any supplemental radiological monitoring and sampling to

be conducted during the work. The SRWP shall be reviewed and approved in writing by the RSO prior to initiation of the work.

5.2.1.3 Record Keeping and Retention

The SHEQMS Volume II, Management Procedures, provides specific instructions for the proper maintenance, control, and retention of records associated with implementation of the program. The program is consistent with the requirements of 10 CFR 20 Subpart L and 10 CFR §40.61 (d) and (e). Records of surveys, calibrations, personnel monitoring, bioassays, transfers or disposal of source or byproduct material, and transportation accidents will be maintained on site until license termination. Records containing information pertinent to decommissioning and reclamation, such as descriptions of spills, excursions, contamination events, as well as information related to site and aquifer characterization and background radiation levels, will be maintained on site until license termination. Duplicates of all significant records will be maintained in the corporate office or other offsite locations.

5.2.2 Performance Based License Condition

This license application is the basis of the Performance-Based License (PBL) originally issued in 1998. Under that license, CBR may, without prior NRC approval or the need to obtain a License Amendment:

1. Make changes to the facility or process, as presented in the license application (as updated)
2. Make changes in the procedures presented in the license application (as updated)
3. Conduct tests or experiments not presented in the license application (as updated).

A License Amendment and/or NRC approval will be necessary prior to implementing a proposed change, test, or experiment if the change, test, or experiment would:

1. Result in any appreciable increase in the frequency of occurrence of an accident previously evaluated in the license application (as updated)
2. Result in any appreciable increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC) important to safety previously evaluated in the license application (as updated)
3. Result in any appreciable increase in the consequences of an accident previously evaluated in the license application (as updated)
4. Result in any appreciable increase in the consequences of a malfunction of an SSC previously evaluated in the license application (as updated)
5. Create a possibility for an accident of a different type than any previously evaluated in the license application (as updated)
6. Create a possibility for a malfunction of an SSC with a different result than previously evaluated in the license application (as updated)
7. Result in a departure from the method of evaluation described in the license application (as updated) used in establishing the final SER or the EA or technical evaluation reports (TERs) or other analysis and evaluations for license amendments