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Cc: ["Brown, Michael E"](#)
Subject: RP Inspection Document request
Date: Tuesday, September 25, 2018 8:53:00 AM
Attachments: [SEQ 18-04 EB3 DocRequest.pdf](#)

Please see the attached document request. We would like to have the documents to us by November 1 (CD is preferred if that works for you).

Let me know if you have any questions.

Thanks,
Adam
(404) 997-4660 office, but out until Oct.9

Sequoyah Nuclear Plant
Radiation Safety Baseline Inspection
Initial Information Request
Inspection Report: 2018004

During the weeks of November 12 - 16, 2018 and November 26 - 30, 2018, the NRC will perform a baseline Radiation Safety Inspection at Sequoyah Nuclear Plant (NRC Inspection Procedures 71124.01, 71124.02, 71124.03, 71124.04, 71124.05, and 71151).

Experience has shown that this inspection is resource-intensive for both the NRC inspectors and your staff. In order to minimize the impact to your onsite resources and to ensure a productive inspection, we are requesting in advance documents needed for this activity. It is important that all of these documents are up-to-date, and complete, thereby minimizing the number of additional documents requested during the preparation, and/or the onsite portions of the inspection. The NRC requests that these documents be provided to the inspectors no later than November 1, 2018.

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 Plant Support Branch 1 Chief, Brian Bonser at 404-997-4653.

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: November 12 – 16, 2018, and November 26 - 30, 2018

Documents Due to Region II by: November 1, 2018

Inspection Procedures:

IP 71124.01	Radiological Hazard Assessment and Exposure Controls
IP 71124.02	Occupational ALARA Planning and Controls
IP 71124.03	In-plant Airborne Radioactivity Control and Mitigation
IP 71124.04	Occupational Dose Assessment
IP 71124.05	Radiation Monitoring Instrumentation
IP 71151	Performance Indicator Verification

Lead Inspector: Adam Nielsen
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Note: The current version of these documents is expected unless specified otherwise. Electronic media is preferred if readily available. *Note that the inspectors cannot accept data provided on USB or “flash” drives due to NRC IT security policies.* Please organize the information as it is arranged below to the extent possible. Experience has shown that a poorly organized CD leads to a less efficient inspection and places additional burden on licensee staff. Pay particular attention to the date ranges for the items requested as they may change from item to item. If there are questions regarding the documents requested, or if the documents cannot be provided by the due date, please do not hesitate to contact the lead inspector.

Miscellaneous

1. List of primary contacts for each inspection area w/phone numbers
2. Corrective action program procedure(s)
3. Most recent 10 CFR 61 analysis for the DAW waste stream

71124.01 - Radiological Hazard Assessment and Exposure Controls

1. Timeline of major outage activities (e.g. Gantt chart or similar list)
2. Procedures related to RP 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, ISFSI Controls, etc.)
3. Procedures related to release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm followup, etc.)
4. List of Nationally Tracked Sources and any change-of-ownership transactions
5. Most recent sealed source inventory record
6. List of all non-fuel items stored in spent fuel pool
7. Last two surveys taken of the ISFSI area
8. Most recent self-assessment or audit covering RP controls
9. List of CRs related to RP controls (e.g. radworker error, RP technician error, posting issues, HRA/LHRA/VHRA issues, survey problems, etc.) issued since May 6, 2017. *This should*

be a list of corrective action documents containing a CR number and brief description, not full CRs.

71124.02 - Occupational ALARA Planning and Controls

1. All procedures related to ALARA (e.g. temporary shielding, ALARA planning, source term reduction, etc.)
2. List of top 5 dose jobs for the upcoming refueling outage and ALARA planning packages (including dose estimates, work hour estimates, special RP controls, and dose reduction initiatives), if available
3. ALARA trending point data for last two outages (last two for both units)
4. Source term reduction strategic plan, if available
5. Minutes from the last 4 Plant ALARA Committee Meetings
6. Most recent self-assessment or audit of ALARA program.
7. List of CRs related to ALARA since December 17, 2016. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs*

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

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. The last 2 grade D air testing certificates for each supplied air system and SCBA filling station
4. SCBA qualification records
 - a) List of all licensed operators qualified to use SCBA
 - b) List of all RP personnel qualified to use SCBA
5. Documentation for last 2 surveillances performed on SCBA stored for emergency use
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 December 17, 2016. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71124.04 – Occupational Dose Assessment

1. Procedures related to occupational dose assessment (e.g. external dose monitoring, dosimetry issuance and use, unusual dosimetry occurrences, multi-badging/extremity dosimetry/badge relocation, Effective Dose Equivalent, personnel contamination events, storage/care of personal dosimeters, use of electronic dosimeters, *in-vivo* and *in-vitro* internal dose assessment, skin dose assessment, QC for whole body counter, use of passive monitoring if applicable, declared pregnant workers)
2. NVLAP accreditation documentation for current dosimetry used by site
3. List of all positive whole body counts, in vitro, or air sampling analyses which resulted in a CEDE equal to or exceeding 10 millirem since December 17, 2016. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection]*
4. List of all Level III personnel contamination events identified since December 17, 2016. *[Note: only a listing should be provided for use by the inspectors to select a sample of issues for review during the onsite inspection.]*

5. Most recent audit or self-assessment of the dosimetry program and/or the most recent audit of the lab that processes site dosimetry
6. List of CRs generated since December 17, 2016, for internal or external dosimetry issues/events. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*

71124.05 - Radiation Monitoring Instrumentation

1. Procedures/Guidance Documents for:
 - a) calibration and functional test/source checks of portable radiation detection instruments
 - b) calibration and functional tests of small article monitor, personnel contamination monitor, portal monitor, whole body counting equipment, and continuous air monitors
 - c) collection and analysis of high-range, post-accident effluent samples
 - d) QA program for count room instruments
2. The last 2 calibration records for each of the following instruments:
 - a) Unit 2 Post-accident Containment High Range Area Monitors (2-RE-90-271, 272, 273, 274)
 - b) Unit 2 Spent Fuel Pit Area (2-RE-90-1)
 - c) Whole Body Counter in Dosimetry office
 - d) All gamma spec and liquid scintillation detectors in count room.
 - e) All Small Article Monitors, Portal Monitors, and Personnel Contamination Monitors at the main RCA exit point.
3. Documentation for the radioactive sources used to calibrate the instruments in item 2 above.
4. Most recent test record of the instrument calibrator (Shepherd validation testing/dose rate curves)
5. Most recent audit or self-assessment covering RP instruments (portables, RCA exit point, WBC, count room). Include any reviews conducted of vendor facilities, as applicable
6. LIST of CRs generated since December 17, 2016 related to portable instruments, area monitors, CAMs, RCA release point monitors, 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 Verification (Occupational and Public Cornerstones)

1. Procedure(s) for gathering and reporting PI data
2. List of all CRs related to effluents/ODCM issues since July 15, 2017. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
3. LIST of all CRs related to LHRA/VHRA issues or significant (>100 mrem) unintended doses since May 6, 2017. *This should be a list of corrective action documents containing a CR number and brief description, not full CRs.*
4. Most recent gaseous and liquid effluent evaluation of dose to the public (year-to-date doses).
5. LIST of electronic dosimeter alarms since May 6, 2017 (dose and dose rate)