

**The following items are requested for the  
Occupational Radiation Safety Inspection  
at Waterford-3**

**Dates of Inspection: 03/15/2021 to 03/19/2021**

**Integrated Report 2021001**

Inspection areas are listed in the attachments below.

Please provide the requested information on or before **Monday, March 01, 2021**.

Please submit this information using the same lettering system as below. For example, all contacts and phone numbers for Inspection Procedure 71124.02 should be in a file/folder titled "2-A," applicable organization charts in file/folder "2-B," etc.

The information should be provided in electronic format or a secure document management service. If information is placed on a *secured document management system*, please ensure the inspection exit date entered is at least 30 days later than the onsite inspection dates, so the inspectors will have access to the information while writing the report.

In addition to the corrective action document lists provided for each inspection procedure listed below, please provide updated lists of corrective action documents at the entrance meeting. The dates for these lists should range from the end dates of the original lists to the day of the entrance meeting.

If more than one inspection procedure is to be conducted and the information requests appear to be redundant, there is no need to provide duplicate copies. Enter a note explaining in which file the information can be found.

If you have any questions or comments, please contact Natasha Greene at 817-200-1154 or via e-mail at [Natasha.Greene@nrc.gov](mailto:Natasha.Greene@nrc.gov).

**PAPERWORK REDUCTION ACT STATEMENT**

This letter 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, control number 3150-0011.

## 2. Occupational ALARA Planning and Controls (71124.02)

Date of Last Inspection: **September 10, 2018**

- A. List of contacts and telephone numbers for ALARA program personnel, as well as the Licensing/Regulatory Affairs staff. Please include area code and prefix. If work cell numbers are appropriate, then please include them as well.
- B. Applicable organization charts including position or job titles. Please include as appropriate for your site, Site Management, RP, Chemistry, Maintenance (I&C), Engineering, and Emergency Protection. (Recent pictures are appreciated.)
- C. Copies of audits, self-assessments, LARs, and LERs, written since the date of last inspection, focusing on ALARA
- D. Procedure index for ALARA Program procedures and other related disciplines.
- E. Please provide specific procedures related to the following areas noted below. Additional Specific Procedures may be requested by number after the inspector reviews the procedure indexes.
  - 1. ALARA Program
  - 2. ALARA Planning
  - 3. ALARA Reviews
  - 4. ALARA Committee
  - 5. Radiation Work Permit Preparation
- F. Please provide a list of NRC Regulatory Guides and NUREGs that you are currently committed to relative to this program. Please include the revision and/or date for the commitment and where this may be located in your current licensing basis documents.
- G. Please provide a summary list of corrective action documents (including corporate and sub-tiered systems) written since the date of last inspection, related to the ALARA program, including exceeding RWP Dose Estimates.

NOTE: These lists should include a description of the condition that provides sufficient detail that the inspectors can ascertain the regulatory impact, the significance level assigned to the condition, the status of the action (e.g., open, working, closed, etc.) and the search criteria used. Please provide in document formats which are “sortable” and “searchable” so that inspectors can quickly and efficiently determine appropriate sampling and perform word searches, as needed. (Excel spreadsheets are the preferred format.) If codes are used, please provide a legend for each column where a code is used.
- H. List of work activities (RWPs) greater than 1 rem, since date of last inspection, including the original dose estimates and actual doses accrued. (Excel format preferred). Please provide all revisions/changes, as well as any related RWPs that support the work activity.

Provide any post evaluations, lessons learned, and/or corrective action documents generated as a result of this work activity. If available, provide any justifications/reasons for actual dose exceedances of the initial dose estimate.
- I. List of active work activities (RWPs) that will be in use while we are onsite, including the dose and dose rate settings, and if available, the planned dose.

- J. Site dose totals for the past 3 years (based on dose of record). Also provide the current year-to-date (YTD) collective radiation exposure (CRE). In addition, please provide another document that separates the online and outage doses for the past 3 years.
- K. Most recent assessment of your isotopic mix, including the hard-to-detect radionuclides and alpha hazards. Include a list of new and historical exposure issues (radiological source term or high exposure areas/activities).
- L. If available, provide a copy of the ALARA outage report or evaluation for the two most recently completed outages for each unit.
- M. Please provide the methods/reports that are in your process to meet the requirements of 10 CFR 20.1101(c) for periodic review of your RP program.
- N. Current exposure trends (BRAC dose rates and/or source term information)