From:	<u>Jonathan Rivera (He/Him/His)</u>
To:	Falkiewicz, Timothy
Cc:	Jack Bell; Jose Diaz
Bcc:	<u>Jonathan Rivera (He/Him/His)</u>
Subject:	Document request for upcoming RP inspection at St. Lucie.
Date:	Tuesday, January 24, 2023 11:13:00 AM
Attachments:	St. Lucie RP Inspection 2023-001 Document Request.pdf

Good morning Tim,

Please find attached the document request for our upcoming inspection the weeks of 2/27/23 and 3/13/23. We are requesting documents be provided to us by 2/23/23.

Thanks, Jonathan

Jonathan Rivera Health Physicist Engineering Branch 3 Division of Reactor Safety U.S. NRC – Region II Office: 404-997-4646 Email: jonathan.rivera@nrc.gov



## St. Lucie Nuclear Plant NextEra Energy Radiation Safety Baseline Inspection Initial Information Request Inspection Reports: 05000335/2023001 and 05000389/2023001

During the weeks of <u>February 27<sup>th</sup> – March 3<sup>rd</sup>, and March 13<sup>th</sup> – 17<sup>th</sup>, 2023</u>, the U.S. Nuclear Regulatory Commission (NRC) will perform a baseline Radiation Safety Inspection at the St. Lucie Nuclear Plant (NRC Inspection Procedures 71124.01, 71124.03, 71124.04, 71124.05 and 71151).

To minimize the impact to your onsite resources during the inspection and ensure the inspectors have the necessary information to complete the inspection while on site, we have enclosed a request for documents needed for this activity. The NRC requests that these documents be provided to the inspectors no later than **February 23rd, 2023**.

If there are any questions about this inspection or the material requested, please contact the lead inspector, Jonathan Rivera at 404-997-4646, or the Engineering Branch 3 Chief, Binoy Desai at 404-997-4519.

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 https://www.nrc.gov/readingrm/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 Procedures:	Occupational and Public Radiation Safety Cornerstones
Licensee:	St. Lucie Nuclear Plant Units 1 and 2
Licensee Contact:	Tim Falkiewicz 772-429-3756 (Office) <u>timothy.falkiewicz@fpl.com</u>
Docket Numbers:	05000335 and 05000389
Inspection Dates:	February 27 <sup>th</sup> – March 3 <sup>rd</sup> , and March 13 <sup>th</sup> – 17 <sup>th</sup> , 2023
Documents Due by:	February 23rd, 2023

### NRC Inspection Procedures (IPs):

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

**Note:** Please provide the current version of these documents in an electronic format if possible (The preferred file format is MSWord, or searchable ".pdf" files). To the extent possible, please organize the information in directories and use descriptive names for the files. Recent experience has demonstrated the most efficient method to transfer this information to the NRC is via Certrec. It is best to upload all the requested information in one large "zip" file. If there are questions regarding the documents requested, or method of transfer, please do not hesitate to contact the lead inspector.

# 71124.01 - Radiological Hazard Assessment and Exposure Controls

(Last inspected September 2022)

- 1. List of active Radiation Work Permits (RWPs) for the upcoming Unit 2 refueling outage (including their dose and dose rate limits).
- 2. Site and Corporate procedures related to Health Physics (HP) controls (e.g., posting, labeling, surveys, RWPs, contamination control, high radiation area (HRA)/LHRA/VHRA control, key control, control of divers, special controls during fuel offload, hot spots, etc.).
- 3. Procedures related to the release of personnel and materials (e.g. release surveys, decontamination, guidance for alarm follow-up, etc.).
- 4. List of non-fuel items stored in spent fuel pool (SFP).

- 5. List of locations, or plant maps indicating the location, of locked high radiation areas (LHRAs) and very high radiation areas (VHRAs), including areas with the potential to become a LHRA during routine operations or outages.
- 6. ALARA planning packages for the 3 highest dose jobs for the upcoming Unit 2 refueling outage.
- 7. Self-assessments or audits covering radiological hazard assessment and exposure controls and HP controls since last inspection (if none, then provide the most recent).
- 8. Corrective Action Program (CAP) documents (CR, NRC, AR, etc.) related to RP controls (e.g., radworker error, HP technician error, posting issues, radioactive source controls, HRA/LHRA/VHRA issues, survey problems, etc.) generated since last inspection. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.

### 71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

(Last inspected September 2021)

- 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. Copy of the last 2 grade D air testing certificates for each supplied air system and Self-Contained Breaching Apparatus (SCBA) filling station.
- 4. Documentation of the last 2 surveillances performed on SCBAs available for emergency use, and negative pressure respirators designated as "in storage" but available for use.
- 5. Two most recent surveillances that verify the flow rates for the Unit 2 Control Room Emergency Air Cleanup Ventilation System.
- 6. Two most recent HEPA filter DOP and charcoal test results for the Unit 2 Control Room Emergency Air Cleanup Ventilation System.
- 7. Training/qualification certificates for any onsite and/or vendor personnel qualified to repair SCBA units since last inspection.
- 9. List of CAP documents related to airborne monitoring and respiratory protection generated since the last inspection. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.

# 71124.04 - Occupational Dose Assessment

(Last inspected September 2021)

- 1. Procedures related to occupational dose assessment (e.g. dosimetry issuance and use, unusual dosimetry occurrences, multi-badging/extremity dosimetry/badge relocation, Effective Dose Equivalent, personnel contamination events, storage/care of personal 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 all years since last inspection up to current date.

- 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 the last inspection. [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 facial contamination and Level III personnel contamination events identified since the last inspection. [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 neutron characterization.
- 6. Most recent alpha characterization.
- 7. TLD results for general plant areas since the last inspection (this is not the REMP TLDs).
- 8. Copies of current whole body counter (WBC) libraries (e.g. routine, medical, investigative, etc.).
- 9. Most recent audit or self-assessment of the dosimetry program and/or the most recent audit of the lab that processes site dosimetry.
- 10. List of CAP documents generated since the last inspection for internal or external dosimetry issues/events. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.

# 71124.05 - Radiation Monitoring Instrumentation

(Last inspected September 2021)

- 1. Radiation Protection and Maintenance procedures/guidance documents, as applicable, for the following:
  - 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, counting room equipment, electronic alarming dosimeters, whole body counting equipment, and continuous air monitors.
  - c. Collection and analysis of high-range, post-accident effluent samples.
  - d. Determination of set-points for area radiation monitor, CAM, PCM, PM, and SAM equipment used for area and personnel monitoring equipment QA program (interlaboratory comparison program) for count room instruments.
- 2. The last 2 calibration records for each of the following instruments (ensure you cover channel calibrations as well as source check):
  - a. Containment High-Range Radiation Monitors
  - b. U1/U2 Main Control Room Radiation Monitor
  - c. ECCS Area Ventilation System Exhaust Monitors
  - d. Plant Vent Stack Radiation Monitors
  - e. Waste Management System Liquid Effluent Radiation Monitor
- 3. Documentation showing traceability to NIST and/or the primary calibration for the radioactive sources used to calibrate the instruments in item in item 2 above.
- 4. Chart or procedure listing emergency action levels (EALs) associated with radiation monitors.
- 5. Emergency plan documents identifying which radiation monitors are used to determine EALs.

- 6. Provide a current list of in service (available for use) SAMs, PCMs, PMs, air samplers, continuous air monitors (CAMs), portable radiation detection instruments, counting room (RP and Chemistry), and Whole-Body Counters. [Note: The list will be used to select monitors for evaluation during the onsite inspection].
- 7. Most recent test record of the instrument calibrators (e.g. validation testing/dose rate curves).
- 8. Design documents and/or calculations showing how the alarm setpoints for the following instruments are determined:
  - a. PCMs and PMs at the RCA and Protected Area exit points
  - b. CAMs
- 9. Results of the count room inter-laboratory comparison program from the last inspection up to current year-to-date.
- 10. 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.
- 11. List of CAP documents generated since the last inspection related to portable instruments, continuous air monitors, RCA release point monitors, WBCs, count room instruments, effluent monitors, and area radiation monitors. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.

# 71151 – Performance Indicator Verification (Occupational)

- 1. Procedure(s) for gathering and reporting PI data.
- 2. List of all CAP documents generated since the last inspection related to LHRA/VHRA issues or significant (>100 mrem) unintended doses. This should be a list of corrective action documents containing a CAP document number and a brief description, not complete documents.
- 3. List of electronic dosimeter alarms since the last inspection (include dose and dose rates).

# General and Miscellaneous Information

- 1. List of primary site contact(s) for each inspection area including name(s), emails and telephone numbers.
- 2. CAP procedures.
- 3. Plant Management and Radiation Protection organizational charts with contact numbers.
- 4. Schedule of major upcoming Unit 2 maintenance/work activities during the weeks of inspection (Gantt chart if available).

# Lead Inspector:

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