



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

June 11, 2019

MEMORANDUM TO: Kevin Hsueh, Chief
Radiation Protection and Consequence Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Micheal Smith, Health Physicist */RA/*
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SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION
PUBLIC MEETING ON MAY 30, 2019 TO DISCUSS THE
UPDATE OF INSPECTION PROCEDURE 71124, "RADIATION
SAFETY—PUBLIC AND OCCUPATIONAL"

On May 30, 2019 the U. S. Nuclear Regulatory Commission (NRC) staff conducted a category 2 public meeting (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19136A331) to present to external stakeholders the process and schedule for the update of Inspection Procedure 71124, "Radiation Safety—Public and Occupational." In addition, the staff solicited recommendations on potential improvements that staff should consider during this effort.

Purpose

NRC staff and industry representatives discussed the process and schedule for the update of Inspection Procedure (IP) 71124, "Radiation Safety—Public and Occupational." In addition, the NRC staff solicited recommendations on potential improvements that staff should consider during the update process.

Meeting Summary

NRC staff began the meeting with introductions and presented slides covering the process and schedule for the IP 71124 update (ADAMS Accession No. ML19135A353). The staff's presentation began with a brief overview of the Reactor Oversight Process (ROP) and IP 71124 attachments (71124.01 – 71124.08). The NRC staff then discussed the IP revision process and discussed factors to be considered by the staff during the update process.

Enclosure:
Meeting Attendance List

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For example, the staff will consider inspection experience, stakeholder feedback and information gained from programmatic reviews to decide what revisions will be made to the IP 71124 attachments. Staff also mentioned that significant changes would be presented during another public meeting currently scheduled for July 23, 2019. Industry representatives asked if the draft IPs would be made available for public comment and staff responded that the draft IPs would not be made available for public comment. However, external stakeholders would be afforded an opportunity to comment on significant changes during the July 23, 2019 public meeting.

The staff also presented items that are currently under consideration for improvements during the IP update. These items are (1) as low as is reasonably achievable (ALARA) inspections (subject to Commission approval); (2) effluent and instrumentation inspections; (3) inspection planning; and (4) oversight of Title 10, Chapter I, of the *Code of Federal Regulations* Part 37. During this discussion staff informed the external stakeholders of the changes to ALARA inspections that are being recommended to the Commission via the ROP Enhancement SECY paper and emphasized that those changes are still pending the Commission's approval. Staff is recommending to retire IP 71124.02 and transition three inspection areas to remaining inspection procedures: (1) ALARA aspects of significant radiological work, (2) implementation of ALARA work controls/worker practices and (3) evaluation of significant deviations from licensees' intended radiological outcomes.

Regarding inspection planning, staff discussed plans to explore approaches to make inspection planning and execution more efficient while maintaining effectiveness and reducing unnecessary burden on licensees. Staff also informed the external stakeholders of plans for working to develop a risk-informed, performance-based framework for the oversight of Part 37 requirements at nuclear power plants. While discussing plans for the oversight of Part 37, industry representatives asked questions and provided feedback to the staff. Specifically, industry representatives commented that it may not be appropriate for all Part 37 violations to be dispositioned under the Radiation Safety Cornerstones. In response, the NRC staff stated that violations of a security-specific nature would not be dispositioned under the Radiation Safety Cornerstones of the ROP; however, if a Part 37 violation impacts radiological material security or control it would be appropriately dispositioned under the Radiation Safety Cornerstones of the ROP.

Staff ended the presentation by explaining the major formatting changes that we will be making to the IP 71124 attachments to be consistent with Inspection Manual Chapter 0040. The staff then allowed industry representatives to make a presentation entitled, "NRC Public Meeting: 2020 Inspection Procedure 71124," (ADAMS Accession No. ML19161A227). The presentation was provided to the NRC staff the day of the public meeting; therefore, the NRC staff were not able to make the presentation publicly available prior to the meeting. Additionally, the day after the meeting Nuclear Energy Institute (NEI) submit an updated presentation that corrected the order of the slides (ADAMS Accession No. ML19151A753)

NEI staff started the industry presentation by discussing the industry's performance. NEI staff further noted that nuclear power plant radiation protection programs are mature and robust and that technology employed in radiation protection programs has improved since the inception of the ROP. During the presentation industry representatives commented that industry's

performance warrants a comprehensive, holistic review of the radiation protection inspection procedures in IP 71124. During this discussion NRC staff stated that while staff would not be conducting a bottom-up review of the radiation protection inspection program, the NRC IP update working group will be reviewing all of the inspection procedures to determine where focused improvements can be made based on inspection experience and the feedback from the industry during the public meeting.

Industry representatives in the room and on the phone also provided feedback regarding the burden associated with inspection planning. Specifically, industry representatives discussed that team inspections and information requests from inspectors can be very time-consuming during outages. It was recommended that team inspections not be performed during outages and that minor issues discovered during outages be dispositioned after the outage to alleviate unnecessary burden on licensee staff during the outage. During this discussion NRC staff responded that staff will consider the feedback pertaining to inspection planning and look for ways to gain efficiencies and reduce unnecessary burden during outages.

Public Comments

There were no comments from members of the public.

SUBJECT: SUMMARY OF NUCLEAR REGULATORY COMMISSION PUBLIC MEETING ON
MAY 30, 2019 TO DISCUSS THE UPDATE OF INSPECTION PROCEDURE
71124, "RADIATION SAFETY—PUBLIC AND OCCUPATIONAL" DATED
JUNE 11, 2019

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OFFICIAL RECORD COPY

Meeting Attendance List:

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Carmen Dykes NRC
Russel Felts NRC
David Garmon NRC
Kevin Hsueh NRC
Bill Pursley NRC
Micheal Smith NRC

Ellen Anderson NEI
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Willie Harris Exelon
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