

U.S. Nuclear Regulatory Commission – Region II 245 Peachtree Center Ave. N.E.
Atlanta, GA 30303-1200

August 17, 2022

INSPECTION DOCUMENT REQUEST

Licensee: Westinghouse Electric Company, LLC

Facility: Westinghouse (Columbia, SC)

Docket Number: 07001151

License Number: SNM-1107

Inspection Report Number: 2022-003

Enterprise Number: EPID: I-2022-003-0056

Inspection Dates: September 12 through 15, 2022

Inspection Procedure(s): IP 88030 – Radiation Protection, Rev. 1/1/2021
IP 88045 – Effluent Control and Environmental Protection, Rev. 3/12/21

Inspector(s): Cynthia Taylor (Team Leader) P: 404-997-4480
Sr. Fuel Facility Inspector E: cynthia.taylor@nrc.gov
U.S. Nuclear Regulatory Commission (NRC) Region-II Office
Division of Fuel Facility Inspection (DFFI)

Gregg Goff P: 404-997-4744
Fuel Facility Inspector E: Gregory.Goff@nrc.gov
U.S. NRC Region-II Office/DFFI

Lindsey Cooke P: 404-997-4836
Fuel Facility Inspector E: Lindsey.Cooke@nrc.gov
U.S. NRC Region-II Office/DFFI

Inspection Document Request for
NRC Inspection at Westinghouse Electric Company, LLC

The following is a request of documents the U.S. Nuclear Regulatory Commission (NRC) inspectors are interested in reviewing prior to the on-site inspection visit consistent with the guidance in NRC Inspection Manual Chapter 0620, "Inspection Documents and Records." The documents provided in response to this request should contain enough information to facilitate the selection of specific inspection samples. Please provide the current version of these documents unless specified otherwise. If any of the information requested below does not apply to the facility, please specify in your response. The licensee is not required to provide documents that are already available in ADAMS. Electronic media is preferred for receiving the information, if readily available (preferably Microsoft Word format or searchable ".pdf" files). The NRC can establish a secure cloud-based file storage service to facilitate document sharing as needed. If there are any questions or concerns regarding the information requested, please contact the NRC inspection team lead.

INSPECTION PROCEDURE 88030 – RADIATION PROTECTION

Documentation Requested in Advance for In-Office Preparation

- 1) Organizational chart with respect to personnel involved radiation protection (RP). Please include their contact information. Please note any personnel changes within the last 12 months.
- 2) Procedures governing the implementation of the Radiation Protection Program, including:
 - i. Radiation Protection (RP) Program Implementation
 - ii. RP Program Review and/or ALARA Program Review
 - iii. RP Operating Procedures (include procedure number, title, and revision #)
 - iv. RP Management Procedures (include procedure number, title, and revision #)
 - v. Radiation/Radiological Work Permits and Job Permits (RWPs/RJPs)
 - vi. Radiological Postings and Access Controls
 - vii. Radiation and Contamination Surveys
 - viii. Respiratory Protection Program
 - ix. Airborne Radioactivity Monitoring
 - x. Dosimetry Program (records for workers can be obtained electronically once on site)
 - xi. Personnel OSLD/TLD Monitoring Program
 - xii. Unplanned Contamination/Safety Significant Radiological Events
 - xiii. Calibration and set point verification for exit monitors such as hand-and-foot monitors (HFMs) and personnel contamination monitors (PCMs)
- 3) Radiological dose records for dose results for workers, minors, and the public (can be made available electronically upon arrival) or combined with line item "i" below.
- 4) Records for internal dose results (bioassay program)
- 5) Records for external dose results
- 6) Records of any significant radiological events within the last 12 months
- 7) Training records of the most recent examples of training/qualifications records for radiological technicians (rad techs) and qualifications records for the instructors

- 8) A list of training and qualification/OJT requirements (qualification card or curriculum) for personnel performing RP-related activities. Please provide about three samples of the most recent training exams for rad tech personnel.
- 9) The latest annual summary report on personnel exposures (i.e., overall dose), ALARA program results and future goals/efforts, samples of original supporting documentation, and conformation of plant management review.
- 10) Listing of corrective actions related to RP for the previous 12 months
- 11) Radiation Safety Committee (or equivalent) meeting minutes for the previous 12 months (may be able to combine with line item "i" above)
- 12) Copies of the most recent self-assessments and/or audit reports for Radiation Protection
- 13) A listing of all radiological survey instrumentation and equipment (i.e., an inventory list)
- 14) Contact information for key personnel expected to support the Radiation Protection inspection

INSPECTION PROCEDURE 88045 – EFFLUENT CONTROL AND ENVIRONMENTAL PROTECTION

Documentation Requested in Advance for In-Office Preparation

- 1) Organizational charts
 - a. Site overall organizational chart. Please provide the names in the individual positions.
 - b. Organizational chart with respect to individuals involved with Effluent Control and Environmental Protection. Please note any management personnel changes since the last inspection.
 - c. Provide the qualifications of any new management personnel in Effluent and Environmental Protection since the last inspection.
- 2) Documentation for any significant changes (excluding updates provided in the renewal process) to the environmental protection program since the last inspection.
- 3) Audits/assessments records of any environmental protection areas since the last inspection period). Also include if applicable, any reviews of the Conceptual Site Model (CSM) process since inception.
- 4) Audits/assessments records of vendors that supply services for environmental protection, remediation and effluent control since the last inspection. Provide the approved vendor's list for environmental, remediation, effluent and waste services. In the list please identify the services that is provided by the vendor.
- 5) Corrective actions records (the entire package) for findings identified in such audits/assessments.
- 6) A list of corrective action for upsets/issues/exceedances/events in effluent control and environmental protection since the last inspection. (A sample will be chosen from the list.)

- 7) Have available records of information important to the decommissioning of the facility including records of spills or other unusual occurrences involving the spread of contamination in and around the site and equipment important to decommissioning (10 CFR 70.25(g)). These records should be available for on-site review.
- 8) Environmental protection procedures, including:
 - a. Procedures that ensure records of leaks, spills, and remediation efforts are retained and retrievable to meet the requirements of 10 CFR 70.25(g)
 - b. Procedures for responding to environmental releases, investigate potential or actual contamination and the evaluation process for leaks and spills.
 - c. Procedures should describe the methodology used for establishing the location of early leakage detection, contamination migration monitoring points, hard to detect leaks may occur (e.g., inaccessible in areas where low-volume, high-activity concentration may exist).
 - d. procedures that describe the methods to be employed to identify leaks that could, over an extended period of time, result in the accumulation of subsurface residual contamination.
 - e. procedures for changing/maintaining airborne sample collection (stack filtration filters), wastewater treatment/liquid effluent treatment, environmental scrubbers.
 - f. operational procedures for airborne sample collection (stack filters), wastewater treatment/liquid effluent treatment and sample collection, environmental air sampler filter change-outs, sediment/soil/vegetation sample collection, groundwater/well sample procurement, sewer discharges/treatment, sample analysis, and data collection/reporting.
 - g. surveillance and calibration procedures for sampling and measurement instrumentation.
 - h. procedure(s) for adding vendors to approved supplier lists and for auditing those vendors; and
 - i. event reporting procedures (including what needs to be reported internally).
 - j. conceptual site modeling (CSM) procedures (including any guidance used for CSM update and decision-making inputs for remediation).
 - k. audit and trending analysis procedures
- 9) For new or changed procedures (since the last inspection) please also include the old procedure, or a markup showing the changes. The change package used to change the procedure, if any. And any training associated with the change. If more than five procedures, please provide a list. (A sample will be chosen from the list.)
- 10) Procedures that govern the corrective action program
- 11) Documentation that describes and/or defines individual radiological exhaust/ventilation stacks and other gaseous discharge points; and the methods used for collecting samples and/or monitoring airborne radioactive emissions data, calibration of environmental sampling equipment. (Include a list of sampled airborne release points vs list of possible airborne release points and basis for which are monitored.
- 12) Documentation that describes and/or defines individual radiological liquid outfalls and any other liquid effluent discharge points, and the methods used for collecting samples and/or monitoring radioactive effluent data for those points.
- 13) Groundwater sampling data produced since the last inspection.
- 14) The most recent calibration records for all instruments used to analyze radioactive

contamination/radioactivity in air samples and liquid samples.

- 15) The basis of any alarm setpoints used for monitoring instruments.
- 16) List of any newly identified subsurface or environmental contamination (found within the last two years).
- 17) Measurement and calculations used evaluate releases (and any trending) and evaluation of trends. Including any releases to municipal sewers or on-site "sewers".
- 18) Records of any samples that were cross-checked by independent labs.
- 19) Semiannual effluent reports for gaseous/air discharges via stacks, liquid discharges (including river discharges), and storm water discharges for 1st and 2nd Qtr. of 2022.
- 20) Records and monitoring of buried waste and waste ponds (if applicable). Including any monitoring to determine that buried non-radioactive waste is indeed non-radioactive.
- 21) ALARA reports since the last inspection.
- 22) Documentation assessing and/or reassessing flow rates from stacks/gaseous release points.
- 23) The two most recent calibration records for instrumentation used to monitor the gross alpha of stack gas effluent and the liquid effluent releases to the river (including, flow rate instrumentation).
- 24) Provide a list of environmental IROFS and their safety function.
- 25) Radiological waste procedures for classification.
- 26) Radiological waste procedures for characterization.
- 27) Radiological waste procedures for handling and storage.
- 28) Radiological waste shipment records over the last 12 months.

Documents/Support Requested for On-site Portion of the Inspection

Walkdown the Waste Treatment Facility and observe collection of liquid and airborne effluent sample activities- Location TBD

- 1) The inspectors will need site support to conduct the waste treatment facility tour and observe ongoing effluent control and environmental activities.
- 2) The inspectors will need site support to coordinate interviews with plant personnel.
- 3) The inspectors will need site support to attend the "plan of the day" meetings.
- 4) Please keep inspectors informed of plant operations on a daily basis.
- 5) Please inform the inspectors of any updates to the Radiation Protection and Effluent Control and Environmental Protection programs that have occurred since this document request was issued.

PAPERWORK REDUCTION ACT STATEMENT

This letter contains mandatory information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0009). The burden to the public for these information collections is estimated to average 1 hour per response. Send comments regarding this information collection to the FOIA, Library and Information Collection Branch, Office of the Chief Information Officer, Mail Stop: T6-A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0009) Office of Management and Budget, Washington, DC 20503.

Public Protection Notification

The NRC may not conduct nor 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 OMB control number.