

SNC Unit S Category 2

NMP-AD-035-001

Departmental Dose Champion Instruction

VERSION 1.4

Special	Conside	rations:
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Applicable to Corporate, FNP, HNP, VEGP 1-2, VEGP 3-4

PROCEDURE LEVEL OF USE CLASSIFICATION PER NMP-AP-003		
CATEGORY	SECTIONS	
Continuous	NONE	
Transient Response	NONE	
Reference	NONE	
Information	ALL	

Approval:	Stephen Taylor	5/19/2022
	Approved By	Date
	RADIATION PROTECTION	

Responsible Department

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VERSION SUMMARY

PVR 1.0 DESCRIPTION

Initial issue of instruction.

PVR 1.1 DESCRIPTION

For clarity, added Vogtle 3-4 applicability statement and added Vogtle 3-4 commitments.

PVR 1.2 DESCRIPTION

- Removed redundant Section 3.0 Step 3.c. since instruction to write a CR is incorporated in Section 3.0 Step 1.c.
- Converted procedure to new template.

PVR 1.3 DESCRIPTION

• Renumbered section 4.0 step 1 to 4.1 and renumbered subsequent steps to clarify that the steps in section 4.0 are actions performed by the Department Dose Champions as requested in TE 1087030.

PVR 1.4 DESCRIPTION

• Corrected titles of responsible personnel to reflect changes in the Work Planning organization in section 3.0 step 4 as requested in TE 1097132.

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1.0 PURPOSE/SCOPE/APPLICABILITY

The purpose of this procedure is to provide guidance to the functions performed by Departmental Dose Champions

This procedure applies to site and corporate personnel to define ownership and responsibilities for the Collective Radiation Exposure (CRE) for themselves, their Departments and the Site.

This procedure will be implemented incrementally at VEGP 3-4 as sections become applicable to the activities being performed by the Operational Readiness Organization and the Construction Organization.

2.0 <u>DEFINITIONS</u>

- 1. **Collective Radiation Exposure (CRE)** The annualized monthly average of both outage and non-outage dose received by the site.
- 2. **Departmental Dose Champion** Individual(s) assigned by station departments to actively participate in the station exposure reduction and planning processes to ensure station exposure goals are achieved.

Typically, the Departmental Dose Champion is an individual with a thorough understanding of the various types of work activities performed by their department.

3. **PARC (Plant ALARA Review Committee)** - Plant Committee consisting of all department managers and chaired by the Plant Manager with the responsibilities defined in NMP-AD-035.

3.0 RESPONSIBILITIES

- 1. The Departmental Dose Champions have the following responsibilities:
 - a. Identify and support exposure reduction initiatives for work activities assigned to their respective department.
 - b. EVALUATE department exposure (normally daily) and PROVIDE analysis and actions to the department's RP ALARA contact.
 - c. Using a threshold of 50 mR for BWRs and 25 mR for PWRs, write a (CR) Condition Report when the actual dose for an activity exceeds the estimated dose by > 25% OR where the actual dose was less than the estimated dose by > 50%.
 - d. Periodically review the Department Exposure Reduction Plans and assess progress and recommend changes as necessary.
 - e. Periodically review the annual department exposure goals.
 - f. Review Refuel/Maintenance Outage department exposure goals and communicate them through the department.
 - g. Review the status of department ALARA suggestions.

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3.0 RESPONSIBILITIES (continued)

- 2. Department Directors/Managers or designees are responsible for the following:
 - a. Designate individuals to function as the Departmental Dose Champion and appoint individuals to function as Departmental Dose Champions.
 - b. Ensure Departmental Dose Champion, or alternate, attends the Dose Champion meetings.
 - c. Ensure department exposure reduction initiatives are implemented.
- 3. Radiation Protection Manager, or designee, is responsible for the following:

NOTE

Typically, Departmental Dose Champions will meet monthly. The Radiation Protection Manager or designee may call additional meetings as necessary. At a minimum, Departmental Dose Champions should meet quarterly.

- a. Establish agenda, date, time and location of Dose Champion meetings.
- b. Issue meeting minutes, which include:
 - Discussion topics
 - Action item status
 - Performance assessment
 - Other matters as appropriate
- 4. The Maintenance Director and/or Outage Director, or Designee, is responsible for:
 - a. Designating the personnel responsible for working with Radiation Protection to develop exposure projections for the following, as appropriate;:
 - (1) Routine work performed by the station
 - (2) Emergent work identified by Operations and/or Engineering
 - (3) Outage work

4.0 PROCEDURE

4.1 ACTIVITIES PERFORMED BY DEPARTMENTAL DOSE CHAMPIONS:

- 1. **Provide** input to RP for department activities in the RCA.
 - a. **Review** the schedule for activities between T-12 and T-8 that will accumulate dose to include, as a minimum, the following items;
 - (1) Is the work at the appropriate "Window of Opportunity"?

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4.1 ACTIVITIES PERFORMED BY DEPARTMENTAL DOSE CHAMPIONS: (continued)

- 1. a. (1) (continued)
 - (a) Can the work be scheduled during an outage?
 - (b) Is the work scheduled prior to a flush or shielding installation?
 - (2) Could the work be re-scheduled?
 - (a) Is the work critical at this time?
 - (b) Is the work being performed at the minimum frequency?
 - (3) Could the activity be performed concurrently with other work in the area?
 - (4) Is there historical information on this task that would support ALARA efforts such as shielding use, flushing, engineering controls?
 - b. Between T-6 and T-3, **use** dose rate and historical information, if available, from RP to develop exposure estimates. RP will assist the Departmental Dose Champions, as needed, in developing dose estimates.
- 2. Between T-3 and T-1
 - a. **Verify** the work scope has not changed.
 - b. **Contact** the RP Work Planning Representative if any changes impact the respective department dose estimate.

NOTE

Historical data for same or similar work, or current information may be used to determine dose estimates.

- c. **Provide** final work schedule to the RP Work Planning Representative and review dose estimates with RP.
- 3. On Line Dose reduction
 - a. **Identify** opportunities to utilize exposure reduction initiatives during work week reviews.
 - b. **Support** implementation of exposure reduction initiatives.
 - Provide assistance to RP in the evaluation of ALARA Suggestions.
- 4. Department Dose Reduction Plans
 - a. **Develop** AND **champion** annual department dose reduction plans (see NMP-AD-035-002 for development of dose reduction plans).
 - b. **Support** presentations of the department dose reduction plans to the PARC.

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4.1 ACTIVITIES PERFORMED BY DEPARTMENTAL DOSE CHAMPIONS: (continued)

- 4. (continued)
 - c. **Communicate** department exposure performance versus goal at team, and other, meetings such as T+1 meetings or monthly PARC meetings.
- 5. Exposure Tracking and Reporting
 - a. Annually

Develop annual department dose reduction plans.

- b. Monthly
 - (1) Provide their department's dose estimate per task to ALARA. This estimate should be based on the person-hour estimate in the dose area for each task as provided by the work group and the dose rates as provided by RP.
 - (2) The Department Head and/or Departmental Dose Champion should present their department's monthly dose estimate at the monthly station PARC meeting.
 - (3) Departmental Dose Champions will check progress against their weekly and monthly goals.

c. Weekly

- (1) ALARA will provide the task specific dose estimates from the Dose Champions to each department for the upcoming week.
- (2) The departments should Review / Validate estimates and respond back to ALARA by noon Friday of the preceding week.
- (3) The Departmental Dose Champion is RESPONSIBLE to ensure their department provides ALARA with any lessons learned by the close of business on Tuesday of the following week.

d. Daily

- (1) Each department is to provide RP ALARA with the previous day's dose overage or underage. The information should be detailed enough to determine how much dose was taken on each task, the task status (complete or % complete), and an explanation for any gaps.
- (2) Each department will provide ALARA with any changes to their work scope for the following day and the dose estimate for each task.
- (3) Each department will contact ALARA to verify the current day work scope and dose estimate.

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RECORDS		
None		
None		
COMMITMENTS		
FARLEY		
None		
HATCH		
None		
VOGTLE		
None		
VOGTLE 3-4		
COMTA 2071		
	None REFERENCES None COMMITMENTS FARLEY None HATCH None VOGTLE None VOGTLE 3-4	REFERENCES None COMMITMENTS FARLEY None HATCH None VOGTLE None VOGTLE 3-4