



ALARA Findings and Observations Regional Perspectives

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Limited ALARA Staff Resources

- ALARA Job Reviews not ready 1 month before outage
- During pre-outage intense planning period, ALARA staff assisting other utilities in outage coverage

ALARA Program Issues

Lack of adequate work planning

- PWR containment recirculation sump strainer modifications
- Chemical decon of BWR Recirc/RWCU systems
- Outage maintenance equipment failures (stud tensioners, CRD winch, refueling bridge)
- Use of operational experience is mixed

ALARA Program Issues (cont.)

Balanced ALARA Program Focus

- Daily dose not commensurate with accuracy of schedule and work execution
- Inordinate concern for personnel contaminations can divert attention away from dose reduction efforts

ALARA Source Term Management

Often not optimal

- Inability to recalculate outage job dose estimates and recalculate cumulative outage dose estimate curve
- Readdress cobalt reduction strategy periodically especially when planning plant modifications or water chemistry changes
- Five-year Dose Reduction Plans often not funded, relegated to Corporate with no Station champion, **does not address needed improvements in work planning and scheduling**