Institute of Nuclear Power Operations

INPO Update:

2017 North American ISOE

**ALARA Symposium** 

January 2017

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**INPO Radiation Protection Manager** 

#### **Update Topics**

- Industry Performance Summary:
  - -U.S. Industry Performance
  - –AFI Trends
  - Continuous Monitoring
- INPO 05-008

## Radiological Protection 770-644-ext



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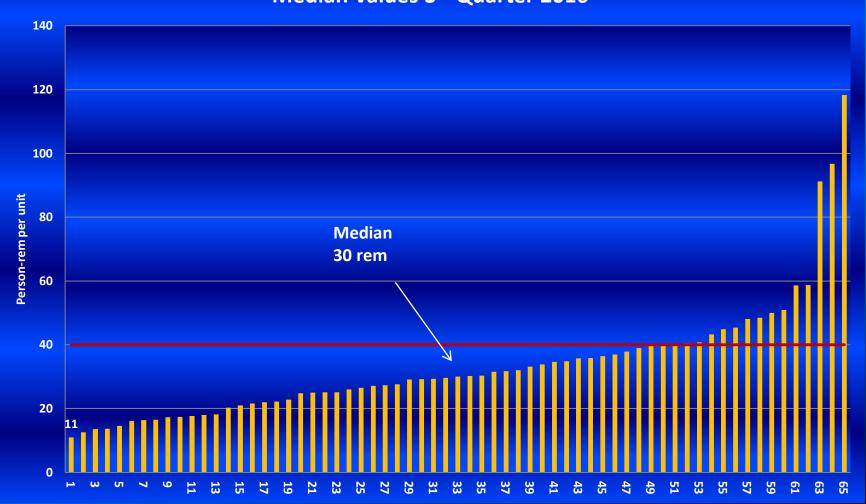








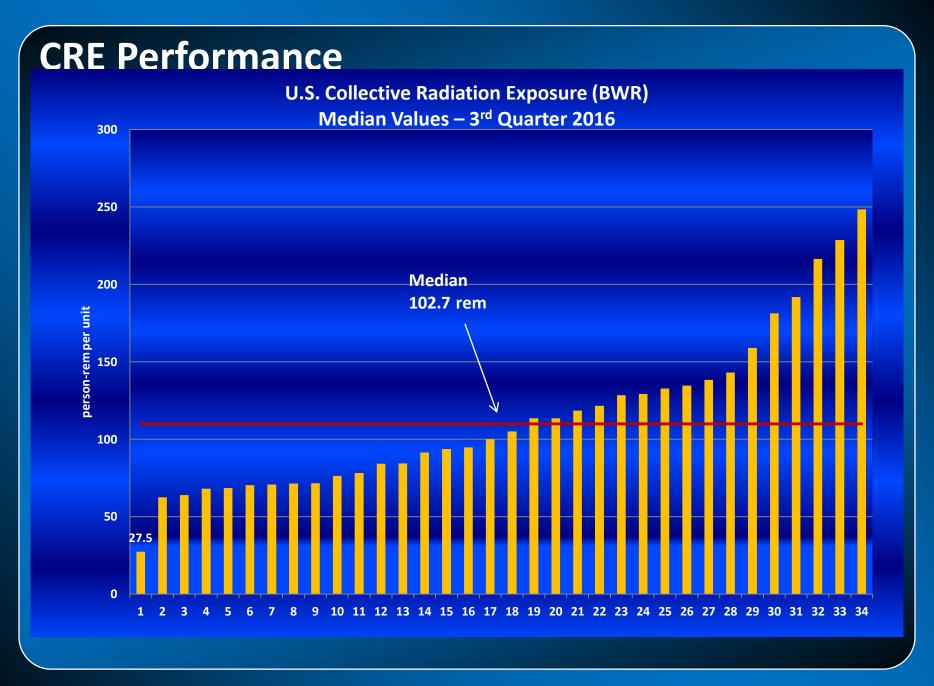




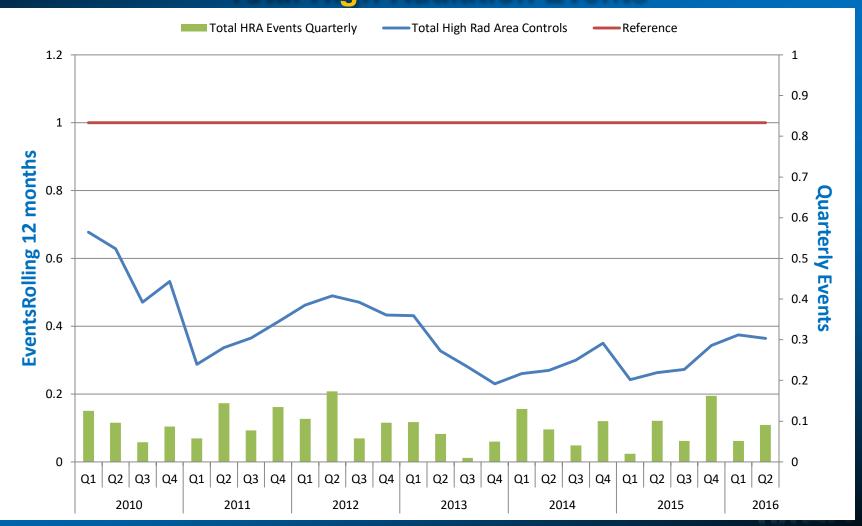
#### **CRE BWR Performance**



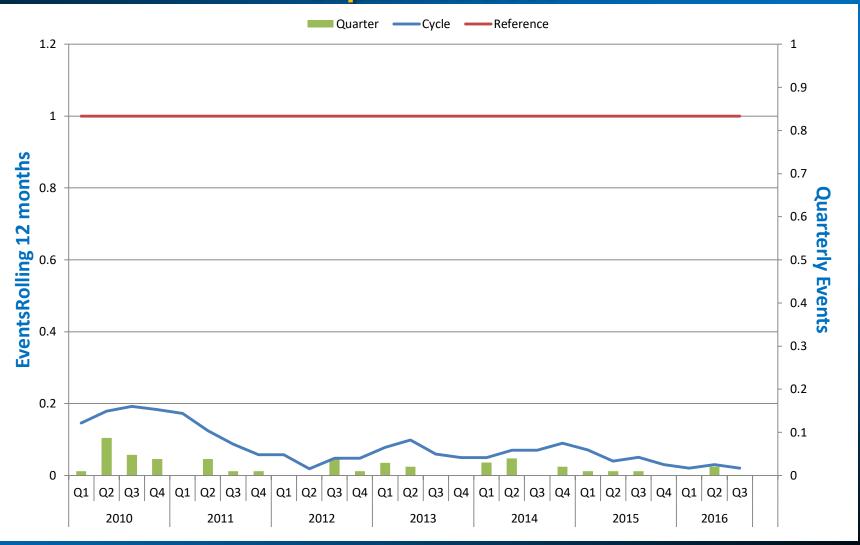




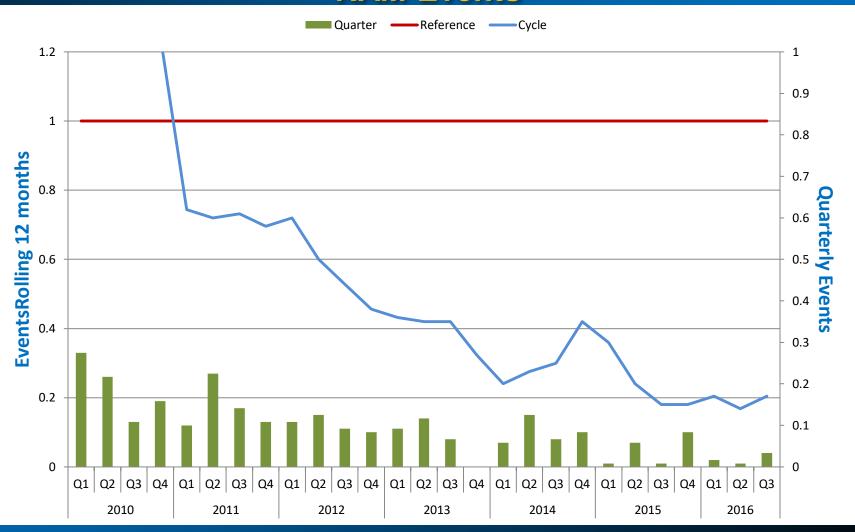
## Industry Performance and Trends (PIC Data) Total High Radiation Events



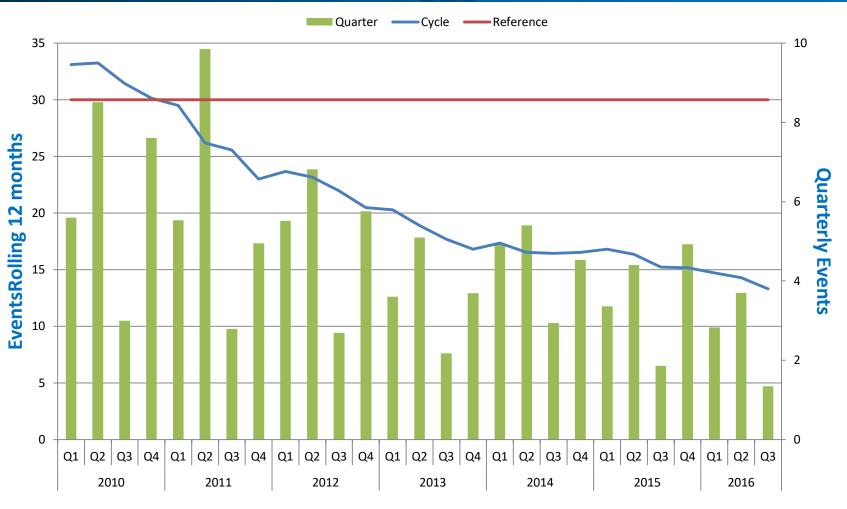
## Industry Performance and Trends (PIC Data) Unplanned Dose



## Industry Performance and Trends (PIC Data) RAM Events



## Industry Performance and Trends (PIC Data) PCEs



#### Illustration of Tier 2 Radiological Performance Indicator

Collective Radiation Exposure

- 40%
- Value is CRE refueling outage plus 24 months non-outage CRE annualized by dividing by 2

Collective Radiation Exposure Goals are: 110 person-rem for BWR 40 person-rem for PWR

Dose Control

- 45%
- Composed of five components
- Based on 12 months

Dose Control Event

• 25%

Dose Control INPO

• 20%

Unintended Exposure Occurrence

VHRA Control Event

LHRA Control Event

VHRA control event is loss of all

Unplanned exposure

>100 mrem is loss of all

- points
- •1 LHRA event is 50% of points
- 2 LHRA events are a loss of all points

Total Unplanned Exposure Internal/External > 10 mrem

Dose Control INPO

- 1 Incidence Loss of one-third points
- 2 Incidence Loss of two-third points
- 3 Incidence Loss of all points

Radioactive Material Control

- 15%
- Composed of two components
- Based on 12 months

Outside Protected Area

Inside Protected Area • 5%

10%

Radioactive Material Control (outside PA)

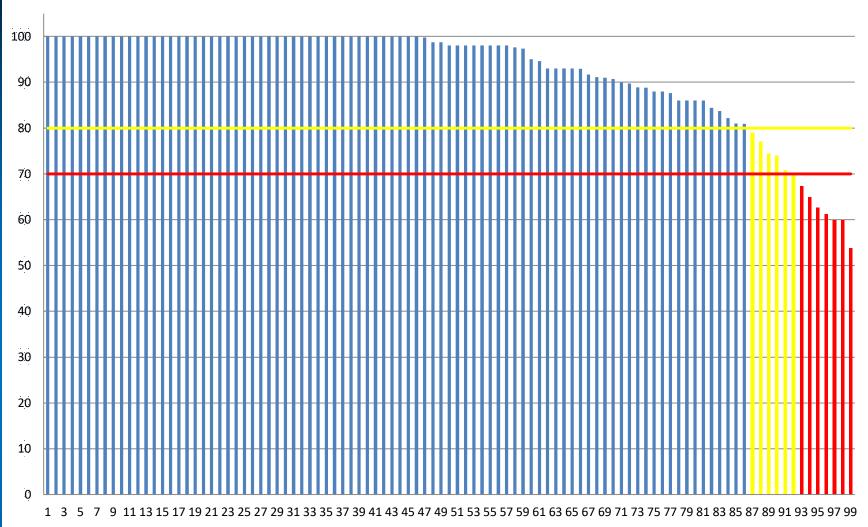
 One event is loss of points

Radioactive Material Control (inside PA)

- •1 event Loss of half of points
- •2 events Loss of all points

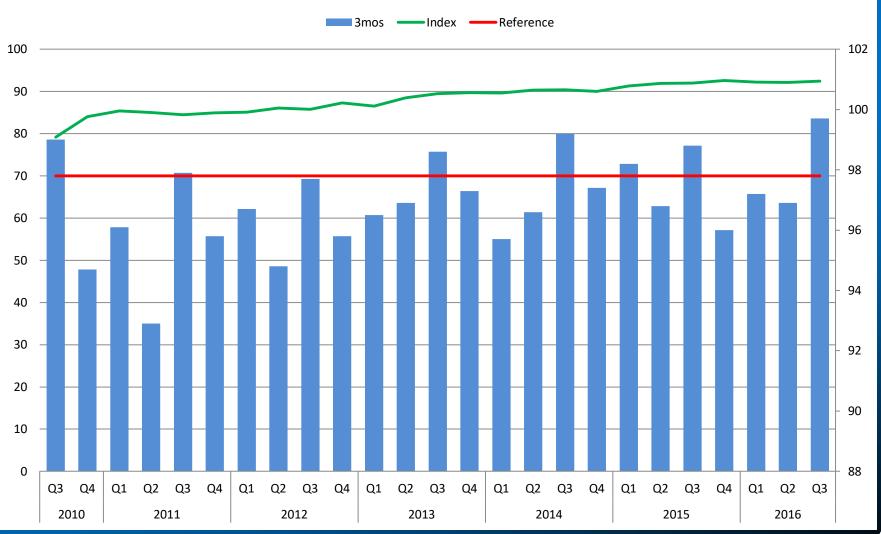
#### **RP Performance Indicator**





#### **RP Performance Indicator**





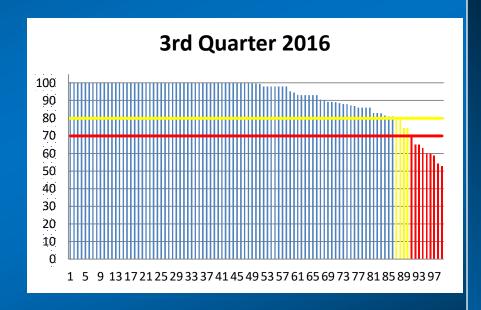
#### **RP Performance Indicator Drivers**

## Performance Monitoring Drivers

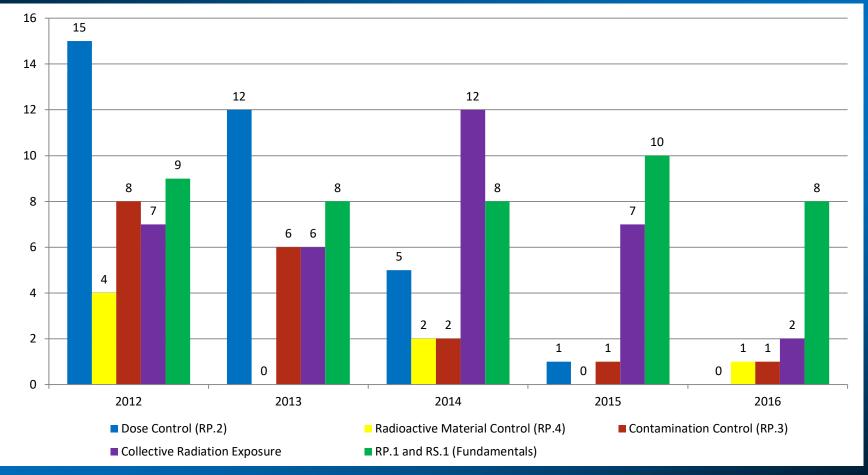
- Collective radiation exposure
- High radiation area events

#### **Common Themes <80 Points**

- CRE above goals
- High CRE with HRA Events
- Internal dose and RAM events



#### RP and RS AFIs Through 3rd Qtr 2016





#### **2016 AFIs**

#### Fundamentals (RP.1, RS.1, NP.1)

- Radiation workers not following procedures for HRA and RAM controls
- Radiation protection technicians not applying fundamentals for HRAs
- RP Supervisor's oversight of radiological work for changing radiological conditions
- Radiation protection not communicating radiological hazards
- Radiation protection technicians not following expectation for work plans
- Radiation protection technicians and supervisors not apply standards
- Qualified radiation workers not communicating radiological hazards
- Radiation workers not monitoring and communicating radiological hazards

#### 2016 Fundamental AFIs Causes

#### Fundamentals (RP.1, RS.1)

- RP Supervisors and technicians do not correct deviations or rationalize deviations because of perceived low risk or low consequence
- Radiation workers deviate because of perceived low risk or low consequence.
- Contributing, supervisors, including radiation protection supervision, are not correcting or coaching to the standard.



#### **Pending 05-008 Revision**

#### Revision 3 of INPO 05-008

#### **INPO Document Hierarchy**

- Tier 1: The standard of excellence expected to be met.
  - PO&Cs; Principles for Excellence in Risk Management; Leadership and Team Effectiveness Attributes; Level 1 and 2 IERs
- <u>Tier 2:</u> Provides information to assist members pursuit of excellence. Intent is the document content is met, strict compliance is not required.
  - Consists of Guidelines; Process Descriptions; Operating Experience
- <u>Tier 3:</u> Reference. Does not need to come from INPO.
  - Good Practice; Manuals; Reports; Must Know OE



#### Why 05-008 Change

Tier 1 – PO&C RP.2-3: Radiological procedures specify posting and control requirements for high radiation areas to prevent inadvertent entry. Access to these areas is controlled through administrative and physical barriers.

Tier 2 - 05-008 guidance: Procedures establish posting, barriers and barricades for various high radiation conditions. Requirements for posting and controlling areas during changing plant conditions are also procedurally established. Procedures related to work in HRA/LHRA/VHRAs are used to clearly define radiation worker, RP technician and supervision responsibilities and accountabilities.

#### Tier 2 – <u>Process Description</u> for Postings:

- ≥ 80 & < 800 mrem/hour
- A barrier is required for the boundary except while the area is accessed. A SOP is not considered as a barrier.
- Ensure posting of access points that require the removal of bolts and/or the use of lifting equipment. Add posting insert to "Contact RP Prior to Opening."

Triangle shaped HRA Sign with the following:

RP BRIEF REQUIRED FOR ENTRY



#### **05-008 Change**

- Currently resolving comments to document.
- Revision 3 gets issued by end of January 2017
- 05-008 Details:
  - Move previous revision content to new format
  - Work with RP CFAMs and RP DNP Task Force
    - Strategic issuance of documents throughout 2017
    - Aligned to PO&Cs
    - Capture standard practice and process
    - Reflect Excellence



#### **Continuous Monitoring**

#### Designed for 2023 End state

- All stations achieve industry goals staying within 1-2 bandwidth, occasional 3
- Repeated INPO 3 assessments are rare
- No assessments of 4 or 5
- No surprise decreased assessments
- No significant events
- Rare accreditation probation



#### **Continuous Monitoring**

#### Measures

- Organization: Monitor, Elevate, Escalate, Recovery
- Functional Area Performance:
  - Excellence, Solid, Acceptable
  - Trajectory Improving, Stable, Declining

#### **Monitoring**

Data – KPIs, OE, Reports, Plant Visits, CFAM, Contact



#### **RP and Continuous Monitoring**

#### Radiological Protection

- Is not a functional area to drive out of 'Monitor'
- Program of concern drivers
  - Multiple radiological events
    - Events causes are tied to fundamentals, or past AFIs
    - Typically accompanied with high CRE, but not exclusive
  - No change or cyclic performance
    - Persistent low performance assessments
    - Multiple evaluations with similar AFIs
    - Assistance not effective



#### **RP and Continuous Monitoring**

- Eleven Programs in 'Decline'
  - Nine INPO members, two WANO members
- Turning Decline' Engagement
  - Notification to RPM
  - Assistance (formal and informal)
  - Recovery plan accountability (formal)
    - Collaborative plan with RP manager and Plant Manager
    - Criteria for exiting
    - Milestones to check



# Institute of Nuclear Power Operations

**Questions & Comments**