Align Personnel Contamination Event Response to Industry Guidance

Align the level of effort and response for low-level personnel contamination events (PCEs) to that described in EPRI guidance. The response to such events will be commensurate with the risk.

Addressees: Chief nuclear officers, NEI and INPO APCs

Issue: RP-01, Respond to Personnel Contamination Events in Accordance with EPRI 1011740, Guidelines for Industry Response to Personnel Contaminations, Rev. 1

Summary of Efficiency Opportunity

- Desired end-state—The industry will follow EPRI guidance when responding to personnel contamination events (PCE). Notably, workers are not restricted from the radiologically controlled area (RCA) in response to a Level 1 PCE.

- Value proposition (vision of excellence)—The response to individual PCEs is determined by the categorical level of contamination. Level 1 PCEs present little health risk to workers or the public. This will reduce administrative burden thereby freeing up resources. Additionally, this will result in resources continuing to be available to perform work subsequent to a Level 1 PCE.

- Why it is important?—Aligning response to PCEs with industry guidance will provide efficiencies in radiation protection and maintenance activities. It will allow personnel to provide focus on activities with worker and public health risks.

- Industry benchmark value(s)—The number of PCEs should remain consistent with current industry performance and within the guidance of one per outage day and one every other month per unit.
Relevant Standards

- Performance Objectives and Criteria (INPO) - Radioactive Contamination Control RP.3, 2013

Guidance

- Guidelines for Radiological Protection at Nuclear Power Stations, INPO 05-008, Rev1
- Guidelines for Industry Response to Personnel Contaminations, EPRI 1011740
- The burden of restricting and remediating workers, detailed investigation, and documentation of individual Level 1 PCEs and development of corrective actions for single events will be eliminated.
- Individual Level 1 events will be tracked and later rolled-up (e.g., at the end of a refueling outage or at the end of a year) to identify opportunities to improve program performance.
- Higher level PCEs and events resulting in multiple Level 1 PCEs will receive appropriate investigation.

Recommend Industry Actions

- Sites should implement EPRI guidance as written.
- Sites should communicate change to personnel. The intent is to reduce burden associated with the typical industry response to radiological events that represent a low risk to employees’ health.

Change Management Considerations

Industry Activities

- Industry webinar to provide background for initiative, INPO discussion, and provide an open forum to clarify expectations and ask questions.
- Discuss at regional RPM meetings and routine industry conference calls.
- Update and discuss during the May 2016 RP manager meeting at INPO.

Company Actions

- Station radiation protection managers to validate exit point controls are sufficient and perform low level tracking and trending based on the EPRI document to prevent instances of contamination outside the RCA.
- Each station to develop a change management plan at their site.
- Sites communicate the change to station personnel and rationale for change.

Report Your Site’s Results

Please report your company’s implementation of this improvement opportunity, including the date of completion. Send this information along with your company point of contact to EfficiencyBulletin@NEI.org.

Key to Color Codes:

Red: NSIAC initiative – full participation required for viability
Blue: Action expected at all sites, but is not needed for broad industry viability
Green: Utility discretion to implement, consistent with its business environment
Industry Contacts

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