

American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

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Standard Urgent

Total Pages: 2

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From: Charles H. Rose To: Mr. Michael T. Lesar, Chief Date: 01-14-2010

FAX Phone: 301-492-3446 Phone: Location: NRC

Reference:

RDB received
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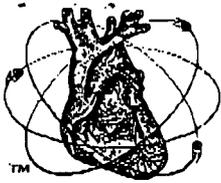
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14 January 2010

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U.S. Mail

Mr. Michael T. Lesar, Chief
Rulemaking and Directives Branch (RDB)
Division of Administrative Services
Office of Administration
Mailstop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Safety Culture

Dear Mr. Lesar:

The development and implementation of Safety Culture starts with the Regulatory Authority. That Authority must demand, not request, that all workers understand radiation safety and the implications of not applying ALARA in an organized manner to all radiological situations.

The last decade has been marked by a reduction in training requirements combined with a significant reduction in reviewing training for compliance with the regulations. The extreme is the provision of 10 CFR 35, 80-200 hours of CLT in a weekend, over the Web.

As a result of these changes, workers including AU's and RSO's often have little knowledge of real radiation safety and its implications to maintaining ALARA.

The Agreement States often, but not always, reflect the attitude of the NRC. When the NRC requires a minimum of 80 hours of CLT as stipulated by 10 CFR 35, the States make that their minimum. Actually this new minimum also becomes the maximum as everyone does the least possible. There is no reasonable way that a true 80 hours of CLT can instill a good radiation safety culture in a worker. Covering the basics, the regulations, 10 CFR 19, 20 and 35 and developing the understanding of safety procedures is not possible in 80 hours. With many receiving unsupervised, undocumented Web based training, for example, and doing it or supposedly doing it in 10-12 hours, a Safety Culture is not possible.

Safety Culture must start with the NRC, be mandated to the States and required of all workers. Nothing new, everything old, didactic, formal and with severe penalties for noncompliance.

Sincerely,


Charles H. Rose, MA, MSPH, D(ABSNM)
Executive Director

CHR:cag

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