



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

**RHODE ISLAND ATOMIC ENERGY COMMISSION**

Rhode Island Nuclear Science Center  
16 Reactor Road  
Narragansett, RI 02882-1165

Mr. William B. Kennedy, Project Manager  
Research and Test Reactors Branch A  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

February 17, 2010

Re: Amendment to License No. R-95  
Docket No. 50-193

Dear Mr. Kennedy:

We are requesting an amendment to Technical Specification 6.2, "Qualifications of Personnel," regarding the qualifications for the radiation safety officer. The current requirement states: "The Radiation Safety Officer shall have a master's degree in health physics or radiological health and three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed."

We propose to change the requirement to read:

"The Radiation Safety Officer shall have a bachelor's degree in health physics or radiological health or a bachelor's degree in a physical or biological science with a physical science minor and eight years of applied health physics experience in a program with a radiation safety environment similar to that of the program to be managed.

OR

The Radiation Safety Officer shall have a master's or doctoral degree in health physics or radiological health and five years of applied health physics experience in a program with a radiation safety environment similar to that of the program to be managed.

OR

The Radiation Safety Officer shall have comprehensive certification by the American Board of Health Physics and four years of applied health physics experience in a program with a radiation safety environment similar to that of the program to be managed."

We believe that the current requirement is overly restrictive regarding education and weak in experience. We have consulted with our counterparts at other facilities and noted that many of them have radiation safety officers possessing a bachelor's degree and a minimum of five to ten years experience.

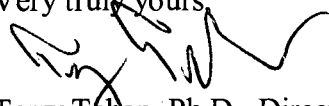
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We note that the NUREG-1556 series states that to demonstrate adequate training and experience, the Radiation Safety Officer should have (1) as a minimum, a college degree at the bachelor level, or equivalent training and experience in physical, chemical, biological sciences, or engineering; and (2) training and experience commensurate with the scope of proposed activities. We also note that the NRC recommends that training include the following subjects:

- Radiation Protection Principles
- Characteristics of Ionizing Radiation
- Units of Radiation Dose and Quantities
- Radiation Detection Instrumentation
- Biological Hazards of Exposure to Radiation (appropriate to types and forms of radioactive material and radiation fields produced in a research reactor)
- NRC Regulatory Requirements and Standards; and
- Hands-on use of radioactive materials.

The amount of training and experience needed depends upon the type, form, quantity and use of the radioactive materials likely to be encountered. Ultimately, the Radiation Safety Officer's training and experience must be sufficient to identify and control the anticipated radiation hazards associated with the operation of a research reactor. In addition, the Radiation Safety Officer candidate should obtain the needed training in a formal course designed for Radiation Safety Officers presented by an academic institution, commercial radiation safety consulting company, governmental entity or a professional organization of radiation protection experts.

Very truly yours,



Terry Tehan, Ph.D., Director  
Rhode Island Atomic Energy Commission

I certify under penalty of perjury that the representations made above are true and correct.

Executed on: 17 FEBRUARY 2010

By:  Ph.D.