Organization of Agreement States

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Thomas Herrera
Division of Intergovernmental Liaison
and Rulemaking
Office of Federal and State Materials
and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Opportunity to Comment on The Formation Of The Inspection Manual Chapter 1246 Working Group And Request For Input On The Courses Currently Included In The Training Curricula For Materials License Reviewers And Materials Inspectors (FSME-10-058)

Dear Mr. Herrera:

The Executive Board of the Organization of Agreement States has reviewed the above document and offers the following comments.

For the past several years both the Agreement States and the NRC have lost many knowledgeable and experienced staff to retirement. Replacement of these staff, when allowed under the current economic constraints, requires a significant investment of resources (both time and money) to produce a competent employee.

The NRC has provided an invaluable assistance to the Agreement States by funding the attendance of our employees to numerous training classes. Over the past two years alone nearly 900 training weeks for Agreement State personnel have been funded by the NRC. The OAS recognizes this accomplishment and greatly appreciates this assistance to the Agreement States, and we hope that the NRC will continue to provide training to Agreement State staff members. Without this assistance, many states will not be able to fund such formal training.

During the recent OAS annual meeting in Portland, Oregon, a considerable amount of time was spent discussing the training needs of new staff hires and how to provide the best overall training that results in a fully competent employee. During this discussion, many state representatives stated they believed the Five Week Health Physics course provided invaluable training for new hires. Some state representatives indicated that the Five Week course was more important than either the Licensing or Inspection courses. This was because they provided state specific training in these areas to their new hires.

***Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin***

Other state representatives agreed that the course was an excellent course, but did not like the fact that their staff would be gone for five straight weeks. They seemed to indicate that the subject matter should be covered, but over two or more courses.

The OAS Executive Board encourages the Inspection Manual Chapter 1246 Working Group to consider ways to allow the funding of state staff to attend the Five Week Health Physics Course (or its equivalent). We recommend that the classroom and affiliated laboratory sections not be separated. We also caution using online training as a means to provide a substantial amount of this training. Online training is often not as effective as classroom training for the student. Students often tend to break up the online training based on their time constraints, which can also affect the knowledge retention of the student.

We appreciate the chance to comment on this subject which will have a great effect on all our programs in the coming years.

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