

RECORD #19

TITLE: Qualification (Experience) of Contractor Health Physicist

FICHE: 03589-027



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 26 1980

Dr. Bobby E. Leonard, President
Institute for Resource Management, Inc.
428 Fourth Street, Eastport
Annapolis, Maryland 21403

Dear Dr. Leonard:

Your letter of June 12, 1980 to Mr. Richardson of the NRC staff requested a clarification of the experience requirements for qualification of individuals in accordance with the guidance in Regulatory Guide 1.8, "Personnel Selection and Training." You specifically requested information on calculation of manhours credit for application to years of experience with regard to health physics or radiation protection technicians.

The NRC staff recognizes that contractor health physics technicians are utilized at many of the power reactor facilities and that considerable overtime is frequently associated with this work. In consideration of this situation, members of the staff of the Office of Nuclear Reactor Regulation and the Office of Inspection and Enforcement developed guidance for the application of manhours to years of experience for use only in determining the qualification of contractor health physics technicians. This guidance recommends that 2,000 or more working hours accumulated during a total period of not less than 40 weeks be acceptable as representing one year of experience. The further breakdown to hours per week is not discussed nor is it appropriate to evaluate work on a week-by-week basis. I'm not aware of any other guidance of this type that has been established for determining the qualifications of any other member of the plant staff.

The type of work performed by individuals is very important in determining whether credit should be allowed towards meeting requirements for years of experience. Obviously, if work experience is solely in a job of very limited scope, then it would not be acceptable for meeting the years of experience requirement. Furthermore, work experience is only one of several criteria which must be met for qualification. Experience, education, training and demonstrated proficiency are all requirements for qualification.

Your letter also points out that the NRC Office of Inspection and Enforcement has recently issued Circular 80-02 which provides for limitations on working hours of 72 hours per week. The guidelines of Circular 80-02 are included to establish maximum allowable limits on working hours and that actual working hours under normal conditions are expected to be less and not be continuously extended to the maximum allowable. This guidance is for an entirely different purpose than that discussed above and as such is not contradictory.

UG 26 1980

An opportunity for public input on this question will be afforded in the near future when Regulatory Guide 1.8 is issued for public comment, at which time the NRC will review comments received and changes in the guide may be made in this regard.

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