

21

RECORD #21

TITLE: Enforceability of NRR Letter Regarding Individuals
Qualified in Radiation Protection Procedures

FICHE: 38289-163



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

Position File 0063/77

DEC 20 1977

MEMORANDUM FOR: W. L. Fisher, Acting Chief, FFMS Branch, Region III

FROM: L. J. Cunningham, Acting Assistant Director,
Division of FFMSI, IE:HQ

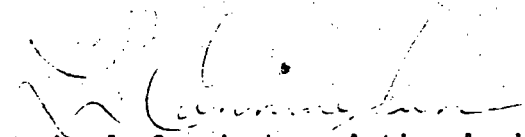
SUBJECT: ENFORCEABILITY OF NRR LETTER TO LICENSEES--RE:
CRITERIA FOR "INDIVIDUALS QUALIFIED IN RADIATION
PROTECTION PROCEDURES

Your memo of November 30, 1977 expressed your doubts about the enforceability of the criteria contained in the NRR letter sent to all operating power reactor facilities. Further, you asked for a determination whether a citation could be issued for failure to comply with any or all of the six criteria.

The following is the Division of FFMSI position regarding your questions:

1. The "Criteria" are to be used as part of the determination of compliance with the technical specification which requires "at least one member of each operating shift crew shall be qualified to implement radiation protection procedures."
2. Any citation must be against the technical specification, not the list of criteria. The list of criteria may be referenced to detail the basis for the citation.

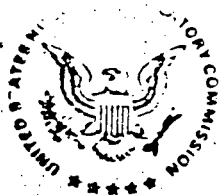
By copy of this memo, all Regions are being informed of the Division position on this subject.


L. J. Cunningham, Acting Assistant Director
Division of Fuel Facilities and
Materials Safety Inspection
Office of Inspection and Enforcement

Enclosures:
Sample Letter
Criteria

cc: L. Higginbotham
P. Nelson
J. Sutherland
G. Brown
H. Book

CONTACT: L. J. Cunningham
49-28188



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

SAMPLE LETTER #1

Docket No. 50-

Licensee

Gentlemen:

RE:

As you may be aware, the provision for "an individual qualified in radiation protection procedures to be on site when fuel is in the reactor" has been a technical specification requirement for the majority of operating facilities for the past several years. The intent of this requirement was to provide a minimum level of expertise in radiological protection at the operating shift crew level. It was intended that these radiation protection personnel would perform routine radiation monitoring activities and thereby supplement a licensee efforts to maintain radiation exposure and release of radioactive effluents "as low as is reasonably achievable".

As a result of recent NRC staff discussions, we have formalized our position regarding the necessary activities "individuals qualified in radiation protection procedures" should be able to perform. These activities and related clarifying information are presented for your information in the attached enclosure.

The OI&E Inspector assigned to your facility will be using this same criteria in determining whether your designated individuals meet these requirements. We recommend you review the enclosed criteria promptly so that you may take any action necessary to meet the requirements.

In the event you desire further discussion of this matter, please contact us.

Sincerely,

, Chief
Operating Reactors Branch #
Division of Operating Reactors

Enclosure:
Criteria for "Individuals
Qualified in Radiation
Protection Procedures"

CRITERIA FOR "INDIVIDUALS QUALIFIED
IN RADIATION PROTECTION PROCEDURES"

An individual is considered to be qualified in radiation protection procedures when a licensee certifies that each designated individual is capable of successfully accomplishing the following activities as required by federal regulations, license conditions, and facility procedures pertaining to radiation protection.

1. Conduct special and routine radiation, contamination and airborne radioactivity surveys and evaluate the results.
2. Establish protective barriers and post appropriate radiological signs.
3. Establish means of limiting exposure rates and accumulated radiation doses, including the use of protective clothing and respiratory protection equipment.
4. Perform operability checks of radiation monitors and survey meters.
5. Recommend appropriate immediate actions in the event of a radiological problem and perform necessary activities until the arrival of health physics personnel.
6. Conduct other routine radiological duties (e.g., TS surveillance items) as may be required on backshifts or weekends.