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RECORD #62

TITLE: Chemistry Technician Training and Qualifications

FICHE: 67208-268

MAR 1 1984

MEMORANDUM FOR: Blaine Murray, Chief  
Facilities Radiation Protection Section  
Division of Vendor and Technical Programs, RIV

FROM: Dennis Allison, Chief, Section B  
Engineering and Generic  
Communications Branch  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

SUBJECT: CHEMISTRY TECHNICIAN TRAINING AND QUALIFICATIONS

I am writing in response to your request for guidance (copy enclosed).

Inspection Procedure 83523 requires preoperational inspection in two areas that relate closely to ANSI N18.1-1971.

Inspection Procedure 83523-02.01b relates closely to N18.1 Section 5. The inspector should determine whether the licensee has or will have a training program in accordance with Sections 5.1 and 5.3 and whether that training program will ensure that Chem Techs are trained in one or more of the three ways described in Section 5.3.4.

Inspection Procedure 83523-02.02a. relates closely to N18.1 Sections 4.1 and 4.5.2. The inspector should determine whether the sampled Chemistry Technicians have received or will have received experience and education in accordance with Section 4.5.2, so that the objectives of Section 4.1 may be reached. Section 4.5.2 requires two years of "working experience in their specialty." Both years of experience could be obtained at the plant before OL (Section 2.2.4). One of the two years of experience could be on-the-job training (Sections 2.2.7 and 4.1). Besides the required experience, Section 4.5.2 recommends one year of related technical training, which could be obtained at the plant or elsewhere (Section 2.2.6).

The above discussion applies also to Inspection Procedure 83723.

With that introduction, let me answer your three questions:

1. If technical specifications will require compliance with ANSI N18.1-1971, we can expect the licensee to comply by OL issuance. Chemistry Technicians

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MAR 1 1984

in responsible positions must have had two years of experience, both of which could have been obtained at the plant as discussed above. "Chemistry Technicians in responsible positions" are those whose decisions and actions during normal and abnormal conditions may affect the safety of the plant. (See N18.1 Section 4.1.) Unless the licensee makes an acceptable case to the contrary, all Chemistry Technicians who perform radiochemistry or coolant chemistry and who are not in on-the-job training should be considered to hold "responsible positions."

New hires at operating facilities also should be treated as above. That is unless they have two years of experience, they may not fill "responsible positions."

2. ANSI N18.1-1971, clearly requires that technician experience be gained in the specialty (e.g., chemistry). Whether experience was gained in one kind of a laboratory or another is irrelevant. The important consideration is the applicability of the experience. The licensee must determine that applicability.
3. ANSI N18.1-1971 does not discriminate against preoperational experience. As above, the important consideration is the applicability of the experience. If the preoperational experience helped prepare the person to work in a "responsible position," it should be counted. Again, the licensee must determine that applicability.

Dennis Allison, Chief, Section B  
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Enclosure: Memo from Murray to Fisher  
dated 1/31/84

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31 JAN 1984

MEMORANDUM FOR: William Fisher, Chief, Section B  
Engineering and Technical Support Branch, IE

FROM: Blaine Murray, Chief, Facilities Radiation Protection Section

SUBJECT: REQUEST FOR IE GUIDANCE ON REQUIRED EXPERIENCE FOR  
CHEMISTRY TECHNICIANS

During recent inspections of licensee's chemistry/radiochemistry programs, the interpretation of ANSI N18.1-1971 in regard to chemistry technician qualifications was discussed. Most facilities have FSAR and Technical Specification requirements which state, in part:

"Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 . . . ."

Section 4.5.2 of ANSI N18.1-1971, Technicians, specifies that, "Technicians in responsible positions shall have a minimum of 2 years of working experience in their specialty. These personnel should have a minimum of 1 year of related technical training in addition to their experience."

The Region IV position has been that all technicians in the chemistry/radiochemistry department must meet the ANSI N18.1-1971 education and experience qualifications before issuance of an operating license at preoperational facilities and at licensed facilities all newly hired chemistry/radiochemistry technicians must meet the ANSI qualifications. Region IV has taken the position that if a technician is assigned responsibilities in the radiochemistry laboratory, the technician must have 2 years experience in a radiochemistry laboratory and the equivalent requirements for technicians assigned responsibilities in the secondary laboratory. It is our understanding that NRR has not established a firm position on this issue. We believe this issue has generic implications at many plants and in other departments besides chemistry. We want to be sure of the NRC's interpretation of the existing requirement so as to have consistent enforcement throughout the industry. We, therefore, specifically request guidance on:

1. Can we enforce the position that all technicians and technical staff in the chemistry department meet the education and experience requirements as stated in ANSI N18.1-1971 prior to issuance of an operating license at preoperational facilities and prior to hiring of new staff at operating facilities?

2. Does a chemistry technician working on both the secondary laboratory and radiochemistry laboratory require 2 years experience on each of these specialty areas or does 2 years experience in a chemistry laboratory of any kind meet the ANSI requirements?
3. For chemistry/radiochemistry technicians assigned to responsible laboratory positions, does preoperational experience count on a one-for-one basis to fulfill the ANSI N18.1-9171 requirement?

*Blaine*

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