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RECORD #173

TITLE: Applicability of Generic Letter 82-12 to Radiation
Protection Staff

FICHE: 69284-001



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

APR 01 1988

MEMORANDUM FOR: Wayne D. Shafer, Chief
Emergency Preparedness and Radiological Protection Branch
Division of Radiation Safety and Safeguards
Region III

FROM: LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

SUBJECT: APPLICABILITY OF GENERIC LETTER 82-12
TO RADIATION PROTECTION STAFF

This memorandum responds to your March 2, 1988 memorandum request for assistance in resolving the subject issue (copy enclosed). We have reviewed the issue and recent enforcement actions taken in this area by Region V.

As stated in the Commission's "Policy on Factors Causing Fatigue of Operating Personnel at Nuclear Reactors" (attached to Generic Letter (GL) No. 82-12), licensees must "establish controls to prevent situations where fatigue could reduce the ability of operating personnel to keep the reactor in a safe condition". Health physics (and chemistry) personnel can be called upon to perform "safety-related" functions during routine and emergency conditions. It is vital that when personnel are called upon to perform these important tasks, they are capable of performing the tasks in a safe, competent manner. Therefore, the guidance of Generic Letter 82-12 should apply to all health physics (and chemistry) personnel who meet the following criteria:

1. Personnel who are assigned certain emergency response duties including assignment to in-plant rescue teams, environmental monitoring and dose calculations, or who handle, process or provide data and input to emergency response decision makers (e.g., at the Emergency Operations Facility or Technical Support Center).
2. Personnel who are assigned to perform, or who could reasonably be expected to perform, safety-related work related to normal plant operations. Such work includes maintenance and calibration of effluent monitors, area radiation monitors, engineered safety feature systems, or any that are "safety-related" as this term is defined in 10 CFR 50.49(b)(1), which is the definition provided in the GL 83-14 clarification of GL 82-12.

Technical Contact: James E. Wigginton
492-1136

APR 01 1988

We cannot support a broader interpretation of safety-related work for purposes of this Generic Letter. It is our position that performing a radiological survey in support of maintenance work on a safety system does not meet the intent of the Commission Policy statement. We agree that providing adequate health physics job coverage is an important worker safety issue; however, such coverage does not stand the test of the GL 83-14 narrow definition of "safety-related".

If you have any questions concerning this matter, please call Jim Wigginton (492-1136) or me (492-1111).

Original signed by LeMoine J. Cunningham

LeMoine J. Cunningham, Chief
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Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

Enclosure:
As Stated

Technical Contact: James E. Wigginton, NRR
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MAR 02 1988

MEMORANDUM FOR: L. J. Cunningham, Chief, Radiation Protection Branch, NRR

FROM: W. D. Shafer, Chief, Emergency Preparedness and
Radiological Protection Branch, Region III

SUBJECT: APPLICABILITY OF GENERIC LETTER 82-12 TO
RADIATION PROTECTION STAFF

An issue concerning the interpretation of Generic Letter 82-12 applicability to radiation protection/chemistry technicians arose recently during an inspection of a Commonwealth Edison Company (CECo) plant in Region III. The interpretation made by CECo was that Generic Letter 82-12 and the technical specifications (which reflect Generic Letter 82-12) apply only to radiation protection/chemistry technicians who are performing "safety-related" functions. Their definition of "safety related" is similar to that referenced in Generic Letter 83-14 for maintenance workers. They concluded that only one radiation protection/chemistry technician per shift was needed to perform the sole identified safety related function (accident chemistry analyses), and therefore CECo applies the overtime restrictions of Generic Letter 82-12 to only one designated radiation protection/chemistry technician per shift.

The position taken by Region III in the past was that Generic Letter 82-12 applies to essentially all radiation protection technicians and professionals. We are no longer certain that this position is correct in light of the references to "safety related" in Generic Letters 82-12 and 83-14. Your assistance is requested to resolve this issue and promote consistency within NRC.

We recognize that a narrow interpretation of "safety-related" would include work such as calibrations of radiation monitors which initiate ESF functions; however, these work situations appear quite limited and probably could be met by one or two technicians per shift. We continue to favor a much broader interpretation of the applicability of Generic Letter 82-12. One interpretation which could get us to that broader application is to assume that radiation protection technicians are performing "safety-related" work when they perform monitoring or surveys of safety related work (e.g., a survey of radiation conditions incident to performance of maintenance work on safety related equipment or performance of safety related operations activities). Such an interpretation would obviously capture essentially all radiation protection technicians/professionals.

L. J. Cunningham

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We appreciate your assistance in this matter. L. R. Greger (388-5644) is the Region III contact for this matter.



W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch

cc: C. Norelius, RIII
J. Hinds, RIII
✓ Wigginton, NRR 11-D-23