

RECORD #325

TITLE: HEALTH PHYSICS POSITION: NEW TRAINING RULE FOR NUCLEAR POWER PLANT  
PERSONNEL

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Division of Radiation Safety  
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Office of Nuclear Reactor Regulation

SUBJECT: HEALTH PHYSICS POSITION: NEW TRAINING  
RULE FOR NUCLEAR POWER PLANT PERSONNEL

The NRC published a final rule, "Training and Qualification of Nuclear Power Plant Personnel," on April 26, 1993 (58 FR 21904) and published a correction of a date on July 21, 1993 (58 FR 39092). PRPB's review of this final rule and supporting supplementary information and earlier Regional feedback on the rule resulted in a number of questions. After discussions with HHFB, PRPB developed the enclosed Health Physics Position which summarizes these questions and the answers. An earlier draft of this position was provided to you on July 1, 1993 for review and comment.

This position is being placed in the NRC public document room to make it publicly available.

Original signed by LeMoine J. Cunningham  
LeMoine J. Cunningham, Chief  
Radiation Protection Branch  
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Enclosure: As stated

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HEALTH PHYSICS POSITION FOR 10 CFR 50.120  
TRAINING AND QUALIFICATION OF NUCLEAR  
POWER PLANT PERSONNEL

QUESTION: Regarding the "Engineering Support Personnel" category listed as requiring training and qualification under the rule, are health physics (radiation protection) professionals (e.g., radiation protection manager, ALARA engineers, and the professional support technical staff, including foremen) included in this category?

ANSWER: No, the only radiation protection job category covered under 10 CFR 50.120 is the "Radiation Protection Technician." The training and retraining requirements for the HP professionals are contained in the plant technical specifications (administrative controls section).

QUESTION: Does the training rule cover contract HP or Chemistry technicians?

ANSWER: Contract Health Physics/Chemistry technicians providing short-term support (e.g., outage work) and not filling a regular position in the permanent plant staff are not required to take part in the training program required by the rule [systems approach to training (SAT)]. However, all contractors assigned to work independently must be qualified to perform the assigned tasks. As an example, ongoing training and qualification programs (which are not part of the facility SAT program) are focused to task-qualify incoming outage workers.

On the other hand, contractors filling permanent plant staff positions that require them to work independently are covered by the rule, and they should be included in the next scheduled session of the staff SAT training for that position.