

247

RECORD #247

TITLE: Response to Request For NRR Position on Contested NOV
Concerning a Licensees Failure to have a Formal Retraining
Program for HP Professionals

247



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

Tu's

NOV 18 1990

MEMORANDUM FOR: James H. Joyner, Chief, FRSSB, DRSS, Region I
Douglas M. Collins, Chief, RPEPB, DRSS, Region II
L. Robert Greger, Chief, RPB, DRSS, Region III
A. Bill Beach, Director, DRSS, Region IV
Gregory P. Yuhas, Chief, RRPB, DRSS, Region V

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

SUBJECT: REQUIRED CONTINUING TRAINING PROGRAM FOR HP PROFESSIONALS

As a result of several regional inspection findings (including a Severity-Level IV notice of violation), headquarters and regional HP management discussed the subject and agreed that a written guidance position is needed for what constitutes a reasonable continuing training program (CTP) for HP professionals. Additionally, the NRC reactor HP management agreed that no generic problem exists and that the overall quality of the licensees' professional HP staff was good to excellent.

As required by the typical Standard Technical Specifications, licensees are committed to some vintage ANSI standard that establishes a retraining or continuing training program that includes HP professionals. The following guidance should be considered when judging the adequacy of HP professionals CTP:

1. Purpose of CTP

- ° To keep up with state of the art
- ° To keep abreast of current industry issues
- ° To maintain awareness of industry performance
- ° To refresh initial technical training

2. Guidance for CTP

- ° Professional programs need to be flexible
- ° Licensees need to formally document commitment for CTP
- ° Time requirements for accomplishing CTP goals should be specified but can be flexible, with large degrees of freedom

3. What Counts as Technical/Supervisory Training

- ° Includes (but not limited to) related formal course work
- ° Progress toward ABHP certification (and continuing credits toward maintenance of certification)
- ° Professional technical meetings (e.g., HPS, EEI, EPRI, ANS, Westinghouse REM seminar, etc.)
- ° Trips or temporary assignments to other plants
- ° Structured self education
- ° Others

As you know, the NRC is currently planning to issue a proposed rule and attendant regulatory guide in the training area. With that in mind, the Human Factors Assessment Branch has reviewed and supports this guidance. However, as a result of the rulemaking, the guidance provided here may need modification.

If you have any questions concerning this guidance, call Jim Wigginton or me.

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

Technical Contact: Jim Wigginton
49-21059

Distribution:

F. Congel	J. Wermiel, NRR
L. Cunningham	S. Shankman, NRR
Central Files	A. Roecklein, RES
PRPB R/F	J. Hickey, NMSS
J. Wigginton	J. Wang, HPPOS
M. Knapp, RI	
J. Stohr, RII	
C. E. Norelius, RIII	
B. Murray, RIV	
R. Scarano, RV	

*See previous concurrence

*SC:PRPB:DREP	*LHFB:DLPQ		D:DREP
JEWigginton:sg	JWermiel	C:PRPB:DREP	FJCongel
11/1/90	11/6/90	LJCunningham	1/90
Document Name:	HP PROF CONTINUED TRAINING	11/7/90	