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TO:
Mr. Benard C. Rusche

FROM:
Duke Power Company
Charlotte, North Carolina
William O. Parker, Jr.

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Ltr. consisting of information concerning individuals qualified in radiation protection procedures.....

(3-P)

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Oconee Units 1-2-3

RJL

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DUKE POWER COMPANY

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Regulatory Docket File

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

May 13, 1977

TELEPHONE: AREA 704
373-4083

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. A. Schwencer, Chief
Operating Reactor Branch #1

Reference: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287



Dear Sir:

Your letter of March 9, 1977 provided guidance concerning the criteria which should be met by "Individuals Qualified in Radiation Protection Procedures". It is our opinion that the criteria listed in your letter are adequate to assure that the responsible individuals provide proper radiation protection at an operating shift crew level. Personnel assigned shift coverage pursuant to the technical specification requirements delineated in Oconee Technical Specification Table 6.1-1, Note 5, meet these criteria.

Additionally, your letter requested that the Oconee Technical Specifications be revised to require that the individual performing the function of Radiation Protection Manager (RPM) meet the minimum qualification requirements of Regulatory Guide 1.8, September, 1975. With regard to the qualifications of the Radiation Protection Manager (RPM), designated as the Station Health Physicist in the Oconee organization, it is our position that the qualifications established in ANSI N18.1-1971 are appropriate minimum requirements for this position.

ANSI N18.1-1971 states that "the responsible person shall have a minimum of 5 years experience in radiation protection at a nuclear reactor facility. A minimum of 2 years of this 5 years experience should be related technical training. A maximum of 4 years of this 5 years experience may be fulfilled by related technical or academic training". The minimum qualifications of the Station Health Physicist (RPM) at Oconee Nuclear Station are based on these requirements.

Regulatory Guide 1.8 requires the RPM to have 9 years of training and experience (a Bachelor's Degree plus an additional 5 years experience, 3 of which must be in radiation protection). The requirements for station Manager and Technical Services Superintendent, as established by ANSI N18.1-1971 and as deemed acceptable by Regulatory Guide 1.8, are 10 years and 8 years of experience, respectively, with a degree not being a requirement. In the Oconee organization, the Station Health Physicist (RPM)

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reports directly to the Technical Services Superintendent who in turn reports to the station Manager. Therefore, while the critical importance of the RPM position is recognized, it is not considered that experience commensurate with that of the station Manager, or the Technical Services Superintendent, the two levels of management directly above the RPM, is necessary for the fulfillment of the responsibilities of this position.

Additionally, the requirement for a Bachelor's Degree is not considered to be germane to the specific functions of the RPM. The only position at the station which presently requires a Bachelor's Degree is that of the Reactor Engineer. The attributes of a good RPM are considered to be gained almost exclusively by specialized on-the-job, practical and supervisory experience rather than through the broad generalized academic training received by a Bachelor's Degree.

Regulatory Guide 1.8 states that "The Radiation Protection Manager (RPM) should be an experienced professional in applied radiation protection at nuclear facilities dealing with radiation protection problems and programs similar to those at nuclear power stations. The RPM should be familiar with the design features and operations of nuclear power stations that affect the potential for exposures of persons to radiation. The RPM should have the technical competence to establish radiation protection programs and the supervisory capability to direct the work of professionals, technicians, and journeymen required to implement the radiation protection programs". This paragraph implies that the RPM is the sole storehouse of technical knowledge who will establish, implement and audit the radiation protection program of the nuclear station.

In Duke's unique situation, however, the Station Health Physicist (RPM) and the Station Health Physics organization are supported by a General Office Health Physics staff called the System Health Physics unit. This staff presently consists of eleven people, nine of whom are professionals in the field of Health Physics. The staff has four people with Masters Degrees and three with Bachelors Degrees. The System Health Physics Unit represents over sixty man-years of direct power reactor health physics experience. The System Health Physicist is presently certified by the American Board of Health Physics and several other staff members are also in the process of becoming certified. The Duke Power Company System Health Physicist and his staff establish the Health Physics Program for each nuclear power station; provide technical direction for conducting these programs; establish the environmental radioactivity monitoring program and the emergency plan; audit the efficacy of these programs and modify them as required, and coordinate a centralized Radiological Laboratory which provides personnel dosimetry, instrument calibration and environmental monitoring services to each station.

The Station Health Physicist (RPM) is responsible for conducting the established Health Physics Program. It is his duty to measure and control the radiation exposure of personnel; to continually evaluate and review

Mr. Benard C. Rusche, Director
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the radiological status of the station; to make recommendations for control or elimination of radiation hazards; to train personnel in radiation safety; to assist all personnel in carrying out the radiation safety responsibilities, and to protect the health and safety of the public both on-site and in the surrounding areas.

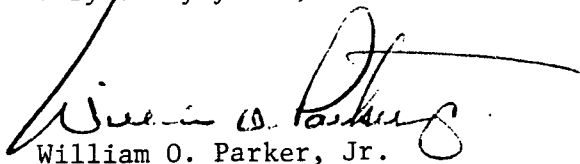
The Station Health Physicist is further supported by two levels of responsible management, the Technical Services Superintendent and the station Manager, as previously mentioned. The Technical Services Superintendent supervises the on-site professional - technical groups which deal with the areas of health physics, chemistry, biology, performance and technical services, and he assures that radiation safety is maximized by the proper application of the Health Physics Program and good interaction between the Station Health Physics organization and other station organizations. The station Manager has the final responsibility for the protection of all persons against radiation and for compliance with NRC regulations, station technical specifications, etc.

Thus, to accomplish the goals of Duke's Health Physics Program which are: (1) to protect the public in the vicinity of a nuclear station, (2) to protect nuclear station personnel, and (3) to protect the nuclear station, a coordinated effort between the Station Health Physicist (RPM) at each nuclear power station, the System Health Physicist and his staff in the General Office organization and the system-wide Radiological Laboratory operated by the System Health Physics organization is utilized.

Since the Station Health Physicist (RPM) is supported by two levels of management and a central Health Physics organization, and the requirements of ANSI N18.1-1971 are minimum requirements, it is considered that the proposed qualifications of Regulatory Guide 1.8 are not appropriate for Duke Power Company. In addition, it is considered that the program for qualification of the Oconee Station Health Physicist will assure that personnel assigned to this position are fully capable of performing the required duties.

It is therefore concluded that personnel appointed to the position of Station Health Physicist are and will continue to be qualified as specified in ANSI N18.1-1971.

Very truly yours,



William O. Parker, Jr.

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