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TO: Mr. Edson G. Case

FROM: Duke Power Co.
Charlotte, N. C. 28242
William O. Parker

DATE OF DOCUMENT 11/21/77

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DESCRIPTION

Furnishing response to NRC's ltr dtd 10/11/77 concerning minimum qualifications of the individual performing the function of Radiation Protection Manager i.e., the Station Health Physicist, at Oconne Nuc. Station...Advising personnel appointed to the position of Station Health Physicist are and will continue to be qualified as specified in ANSI N18.1-1971...

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ENCLOSURE

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

TELEPHONE: AREA 704
373-4083

November 21, 1977

Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

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

Dear Mr. Case:

In your letter of October 11, 1977, you provided additional comments on the minimum qualifications of the individual performing the function of Radiation Protection Manager (RPM), i.e., the Station Health Physicist, at Oconee Nuclear Station. Our position remains that the qualifications established in ANSI N18.1-1971 are appropriate minimum requirements for this position as stated in our May 13, 1977 response to your initial correspondence dated March 9, 1977.

Your letter advised that Regulatory Guide 1.8 does not require the RPM to have a Bachelor's Degree. However, it does state that the RPM must have nine years of training and experience. This experience level is on the same level as that required for the position of station Manager and Technical Services Superintendent. These positions require ten and eight years of training and experience, respectively, and represent the two levels of supervision above the RPM. The fact that the station Manager and the Technical Services Superintendent have greater responsibilities than the RPM is evident, therefore, it is expected that the minimum requirements of the RPM should not be greater than these two positions.

In addition, the position of Station Health Physicist at Oconee Nuclear Station is not identical to the position of RPM as described in Regulatory Guide 1.8. In Duke's unique situation, the Station Health Physicist and the Station Health Physics organization are supported by a General Office Health Physics staff called the System Health Physics Unit. Therefore, the Station Health Physicist at Oconee is not the sole person who fulfills the role of RPM as defined by Regulatory Guide 1.8. The System Health

Physics Unit establishes the health physics program for Oconee Nuclear Station, provides technical direction for conducting the programs, establishes the environmental radioactivity monitoring program and the emergency plan; audits the efficacy of these programs and modifies them as required and coordinates a centralized Radiological Laboratory which provides personnel dosimetry, instrument calibration and environmental monitoring.

As described in our May 13, 1977 letter, the System Health Physics Unit represents over 60 man-years of direct power reactor health physics experience. The staff of the System Health Physics Unit consists presently of 12 people, nine of whom are professionals in the Health Physics field, including four with Master Degrees and four with Bachelors Degrees.

It is felt that the Station Health Physicist qualified to ANSI N18.1-1971, supported by the System Health Physics Unit provides a more comprehensive radiation protection program than a single individual qualified to Regulatory Guide 1.8. Our position is further supported by a December, 1976 proposed revision to ANSI N18.1 which states under Section 4.4, Radiation Protection, "At the time of initial core loading or appointment to the position, whichever is later, the responsible person shall have a minimum of four years experience in applied radiation protection. A minimum of two of the four years shall be in radiation protection work at an operating nuclear power plant. In addition, he shall have a minimum of two years of related technical training or have satisfactorily completed a comprehensive specialty program in radiation protection. In addition, the owner organization shall have either in the person described above or another person and either on site or off site an individual possessing the following qualifications. A Bachelor's Degree or the equivalent in a science or engineering subject, including formal training in radiation protection. He should have at least five years of professional experience in applied radiation protection. (A post graduate degree may be considered equivalent to one year of professional experience and a doctor's degree may be considered equivalent to two years of professional experience where course work related to radiation protection is involved). At least three years of this professional experience should be in applied radiation protection work at an operating nuclear power plant."

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.

William O. Parker, Jr. By

LJB:vr