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United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry

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October 9, 1979

PROPOSED RULE *PR* *Misc letter*
Reg Guide



Secretary
U.S. Nuclear Regulatory Commission
Matomic Building
1717 H Street, N.W.
Washington, D.C. 20555

Dear Sir:

The enclosed comments are directed to the Draft Regulatory Guide and Value/Impact Statement on radiation protection training.

The United Association is a pipefitter and plumber 350,000 member international union. Our members build, maintain, and turn-around nuclear power plants and would be greatly affected by this proposal.

Sincerely,

Joe A. Adam
Joe A. Adam, Director
Department of Safety and Health

JAA:jp
Enclosure
cc: G. Taylor
J. Lapping
S. Cooper

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1001 Jeter's Secretary-Treasurer



United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry

Composed of journeymen and apprentices who are proud of their skills and the industry.

United Association Building, 901 Massachusetts Ave. N.W. Washington, D.C. 20001 Phone (202) 628-5823

Comments on the Draft Radiation Protection Training for Light-Water-Cooled Nuclear Power Plant Personnel Regulatory Guide and Value/Impact Statement.

These comments are directed toward Section C, paragraph 6, Evaluation of Trainee Performance.

The draft suggests that trainees evaluated should score high (80% or higher) on oral or written tests. It is the opinion of the United Association that these test scores should be 100%.

Since the only radiation protection information given to the trainee will be that information necessary to the workers needs, it is extremely important that there are no gaps in the workers knowledge.

The draft states that the following material should be included in a worker training and education program:

1. Immediate and latent radiation effects;
2. Risks associated with the acceptance of radiation exposure;
3. Licensee plant rules;
4. Warnings and alarms under normal and accident conditions;
5. Measurement and control of radiation and radioactive materials;
6. Sources of radiation;
7. Use of dosimeters;

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8. Use of personal protective equipment;
9. Emergency procedures.

None of the above items can be considered non-essential to the workers health and safety. Only that information absolutely necessary to the employees safety and health should be included in the evaluation and rating. Nice to know information should be recognized as course content filler and not included in the trainee evaluation.

If the trainees do not understand relevant course material and score below 100%, they should be reinstructed and retested until the 100% level is achieved.

It is dangerous to pursue a line of reasoning which states that persons exposed to possible radiation hazards could be considered adequately trained if they know 80% of the necessary information.

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