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DOCUMENT NUMBER
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PR *Misc Justice
Reg Guide*

Box 4659 Suite 306
Atlanta, Georgia 30302
12 Oct 79

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Attached are my comments by numbered or lettered division for draft regulatory guide and value/impact statement Task OH717-4, Division 8 issued August 1979 entitled "Radiation Protection Training for Light-Water-Cooled Nuclear Power Plant Personnel".

I urge the swift adoption of this guide with attention to the comments that I have made. It is something that has been needed for a long time.

Sincerely,

Mary S. Wegner

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Acknowledged by card...

of 10/22

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COMMENTS ON OH-717-4

A. No comments. I agree with this section as written.

B. No comments. I agree with this section as written.

C. 1. General

1. An individual's prior training and previous experience should also be considered.

2. On-the-job training and performance testing may not be practical for transient workers, particularly the large numbers who are in-processed daily during an outage.

3. There is nothing necessary for power plant workers to know about health physics that cannot be taught in eight hours. This includes four hours basics and four hours site-specifics.

4. Omit the words "so as to avoid the necessity for an escort" (Escorts are not a proper substitute for training, but may be necessary for security purposes.)

5. and 6. No comments. I agree with these paragraphs as written.

2. Who Should Receive Radiation Protection Training

Employers of transient workers should provide basic radiation protection training and should certify that that training meets the requirements of this guide. This should be accepted by the facilities for the basic Radiation protection training.

3. Objectives

No comment. I agree with this section as written.

4. Timing

No comments. I agree with this section as written.

5. Radiation Protection Training Program Content

No comments. I agree with this paragraph as written.

5.1 Radiation Biology

I agree with this section as written, especially with the idea of putting the risk of exposure into perspective. I have worked with several men who were terrified of radiation.

5.2 Measurement and Control Of Radiation Exposure and Radioactive Material

No comment. I agree with this section as written.

5.3 Radiation Protection Programs

"RPT should include special attention to the use of respiratory protective devices....." Not necessary here---respirator training is extensively covered in that class and is sufficiently regulated by Regulatory Guide 8.15 and NUREG-0041.

5.4 Emergency Preparations

No comments. I agree with this section as written.

5.5 Special or Non-routine Work

No comments. I agree with this section as written.

5.6 Training with Mockups

No comments. I agree with this section as written.

6. Evaluation of Trainee Performance

Oral and performance testing may not be practical for processing short term transient personnel for outage situations. Essay and calculation type questions are more difficult to grade and may not be appropriate for the short term transient worker. Practical and OJT tests also may be impractical for in-processing the large numbers of short term transient workers required for outages. Assessing attitudes is the proper domain of the psychologist or psychiatrist, not an HP technician.

7. Radiation Protection Staff

No comments. I agree with this section as written.

8. Records

Sentence 1-- a hearty AMEN! In fact --to the entire section AMEN! and HALLELUJAH! I agree with this section.

D. No comments. I agree with this section as written.

Table 1 item j. Respiratory Protective Devices- - - is more properly covered in a special class of four to eight hours length for those personnel required to use the devices.

Draft Value/Impact Statement

No comments. I agree with the statement as written.

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