

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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PROPOSED RULE PR - Miss Notice
Reg. Guide October 29, 1979



Secretary of the Commission
Attn: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: (1) Draft Regulatory Guide and Value/Impact Statement,
August, 1979; "Radiation Protection Training for
Light-Water-Cooled Nuclear Power Plant Personnel".

Gentlemen:

Northeast Utilities Service Company
Comments on Draft Regulatory Guide and Value/Impact Statement

As requested in Reference (1), Northeast Utilities Service Company (NUSCO) hereby submits the attached comments, pertaining to the Reference (1) Draft Regulatory Guide, as Attachment 1.

We trust these comments will be useful in developing radiation protection training for personnel working in nuclear power plants.

Very truly yours,

NORTHEAST UTILITIES SERVICE COMPANY

W. G. Council
W. G. Council
Vice President

Attachment

Acknowledged by card 11/5/79.....

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ATTACHMENT 1

COMMENTS ON DRAFT REGULATORY GUIDE AND VALUE/IMPACT STATEMENT

"RADIATION PROTECTION TRAINING FOR
LIGHT-WATER-COOLED NUCLEAR POWER PLANT PERSONNEL"

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Comment

- 3/1 The length of training should not be the overriding thrust of this guide. The level of training a worker receives is the important concern.
- 3/2 The use of trained workers as escorts should be allowed in other than high radiation areas. A training cost versus expected exposure benefit should be performed.
- 3/6 The guide does not accurately define transient workers and visitors. These two classes may be differentiated by either expected exposure time in a radiation area or by the amount of radiation the person is expected to receive.
- 4/c (Secondary Objectives) The value/impact to the industry could be increased if the guide provided a standard format and content for the training program. The uniform training program would provide standard certification and negate the need for auditing by Inspection and Enforcement. Significant amounts of time, money, and confusion would be saved. The concept of certification would allow workers to transfer their training certification from one facility to another.
- 5/1 Onsite "field instruction" should be limited to work within high radiation fields.
- 5/3 "Appropriate reference documents . . . should be made available to each trainee".

This requirement will ensure accessibility to information for all personnel while, at the same time, prevent needless paperwork.
- 6/2 The requirement established by this paragraph should be included in the normal training/retraining program.
- 7/Section 5.3 The environmental effects of radiation should not have to be discussed when presenting a radiation protection training course to workers. Additionally, not all workers require respiratory training. Mockup training is beneficial but also costly and should only be required where the total collected dose received would be greater than 10 - 50 man-rem.
- 9/Section 6 NU disagrees with the requirement that essay questions be utilized in the evaluation of worker trainee performance. These questions are generally difficult to evaluate

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Comment

as the grader must interpret the response of the trainee. Multiple choice questions are preferred. It is understood, however, that radiation protection personnel must possess a greater degree of knowledge and as a result, must be evaluated by fill-in-blanks and/or essay-type exams.

"Each worker's knowledge, competency, and understanding of the training must be evaluated by examination and observation of practical application.

Written exams should be graded on a Pass/Fail basis. While it is not expected that every trainee achieve 100 percent on an exam, it must be recognized that a person may achieve an acceptable score (i.e., 80 percent or better) but demonstrate a lack of knowledge in a critical area. The instructor must evaluate the trainee based on specific answers to specific questions.

Practical knowledge would be evaluated and documented by a qualified individual completing a "check off" while observing the trainee.

Exams and practical evaluation shall be carefully designed to evaluate knowledge and reinforce the key points of the training. Handouts may be used as a supplement.

Written exams may be true or false and/or multiple choice for all trainees except for Radiation Protection staff. Radiation Protection personnel have a degree of knowledge that must be evaluated by fill-in blanks and/or essay-type exams."

10/4

Radiation Protection Staff should be required to be familiar with radiation protection problems associated with major primary or contaminated plant systems or areas. This would limit the use of training on PWR secondary systems which have no effect on radiation safety.

11/Section 8

The NRC should provide a standard format and content for the training program. The licensee is ultimately responsible for the individuals on-site and assuring that they have received adequate training. With a standardized training program, workers could transfer training from one site to another with exception of site-specific training. Recordkeeping of training received by an individual would be simplified if a standard format and content were developed.

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