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DOCKET NUMBER  
 PROPOSED RULE *PR- Misc. Notice  
 Reg. Guide*

October 22, 1979

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

Attention: Docketing and Service Branch

Dear Sir:

Attached are our comments on Division 8 Task OH 717-4  
 "Radiation Protection Training For Light-Water-Cooled  
 Nuclear Plant Personnel".

We appreciate having been given the opportunity to comment.

*Perry L. Barnes*  
 Perry L. Barnes  
 Nuclear Licensing Dept.

Attachment

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Acknowledged by card *10/29 dl*

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COMMONWEALTH EDISON - PRODUCTION TRAINING DEPARTMENT

COMMENTS ON PROPOSED REGULATORY GUIDE/V.I.S.

(USNRC/OSD Div. 8 Task OH 717-4)

"Radiation Protection Training for Light-Water-Cooled Nuclear Power Plant Personnel"

FORMAT OF THIS COMMENTARY

Each comment specifies "IS," "SB" (should be) and "WHY."  
"IS" serves to identify a part of the subject document;  
"SB" indicates what should replace the identified part;  
"WHY" gives the basis for the replacement.

COMMENTARY

1. IS: (Title of document)

SB: "RADIATION PROTECTION TRAINING FOR PERSONNEL AT LIGHT-WATER-COOLED NUCLEAR POWER PLANTS"

WHY: Semantics

2. IS: (C.1., paragraph 3, sentence 2)

IS: "Minimum training"

SB: "Training"

IS: "more for workers"

SB: "more for certain workers"

WHY: Put anticipated utility of 40-hour program into practical perspective.

3. IS: (C.1., paragraph 4, sentence 1)

SB: "The use of trained workers as escorts for untrained workers, as a substitute for RPT, should be avoided whenever practicable."

WHY: Clarification of statement strength

4. IS: (C.2., paragraph 2, sentence 1)

IS: "who enter the plant for purposes"

SB: "whose main purpose at the plant is"

IS: "for the licensee . . . radiation doses"

SB: "in restricted areas,"

WHY: Clarify definition of Visitor, in terms that have previously been defined.

5. IS: (C.3.c.)

IS: "assurance that"

SB: "information to help"

IS: "can keep"

SB: "keep"

IS: "ALARA and that ALARA . . . of others."

SB: "ALARA."

WHY: Providing "assurance" is not a performance-oriented training objective. The fact that ALARA can be implemented is obvious to the trainee who has been taught how to apply it to himself.

6. IS: (C.4., paragraph 2, sentence 4)

IS: "discussed by . . . staff at"

SB: "discussed at"

WHY: This responsibility is not exclusive to the RP staff.

7. IS: (C.5., sentence 3)

IS: "should be given to each"

SB: "should be made easily available to each"

WHY: Handing out volumes of paper has no training advantage, but it has cost. Availability, however, is important.

8. IS: (C.5.3., paragraph 2, sentences 4 and 5)

IS: "should include special attention to"

SB: "should address "

IS: "procedures. It is essential that"

SB: "procedures for"

IS: "devices be trained"

SB: "devices. Such personnel should be trained"

WHY: Limiting respiratory equipment training to those in need of it

9. IS: (C.5.3., paragraph 3)

SB: (omit)

WHY: Explaining regulations and regulatory guides is a process that is redundant to conducting training based on such regulations and regulatory guides, insofar as attainment of training objectives is concerned.

10. IS: (C.5.4., paragraph 2, sentence 1)

IS: "should be familiar"

SB: "should be sufficiently familiar"

IS: "with the details of"

SB: "with"

IS: "so they will know"

SB: "to know"

WHY: Specifying the desired level of familiarity

11. IS: (C.5.4., paragraph 3, sentence 1)

IS: "should emphasize the"

SB: "should include information on"

WHY: The requirement for emphasis is carried implicitly in emphasizing preparations for emergencies. The quality of emphasis is lost when everything is emphasized.

12. IS: (C.5.4., paragraph 3, sentence 2)

SB: (omit)

WHY: Simply untrue. Such instruction may occur via diagrams, pictures, etc., at any training location, with comparable results.

13. IS: (C.5.6., paragraph 1, sentence 3)

SB: (omit)

WHY: Going into this level of detail is inappropriate here.

14. IS: (C.5.6., paragraph 2)

SB: (omit)

WHY: Mockups are generally fabricated in the event, and not in anticipation, of high-man-rem tasks. Dissertation on the value of facility mockups is superfluous to the point being made.

15. IS: (C.5.6., paragraph 3, sentence 1)

SB: (omit)

WHY: Misplaced statement

16. IS: (C.5.6., paragraph 3, sentence 3)

SB: (omit)

WHY: Such a statement of the obvious, by its very inclusion, encourages misinterpretation to mean the formal On-Site Review process.

17. IS: (C.5.6., paragraph 3, sentences 7 and 8)

SB: (omit)

WHY: Low-man-rem tasks that are repetitive are likely to be performed by a limited number of workers, which performance better serves the training purpose than any mockup.

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18. IS: (C.6., paragraph 1, sentence 1)

IS: "knowledge, competency, and"

SB: "knowledge and"

IS: "regard to the"

SB: "regard to"

IS: "safety aspects . . . performed."

SB: "safety."

WHY: Competency evaluation must be done on-the-job, which is contrary to ALARA. Evaluations tailored for specific jobs are impractical except in very special cases.

19. IS: (C.6., paragraph 1, sentence 2)

IS: "should, in most cases,"

SB: "could, in some cases,"

WHY: Such a "practical" test is usually not practical. It also involves exposure of the evaluator, which is contrary to ALARA. (See above.)

20. IS: (C.6., paragraph 1)

SB: (add) "Satisfactory performance by an individual on a requalification test, when such test includes all topics treated in the refresher training, may be substituted for refresher training for that individual."

WHY: Insofar as we utilize accurate evaluations of workers' knowledge and understanding as evidence of need of further training, so should we utilize them as evidence of need of no further training.

21. IS: (C.6., paragraphs 4 and 5)

SB: (omit)

WHY: Judgements on the values of various testing methods should be reserved for those with competence in the field. Practical tests could only show net benefit when conducted on a sample basis, and then to evaluate the training program rather than the trainee.

22. IS: (C.6., paragraph 6, item c.)

IS: "of and . . . person's"

SB: "his"

WHY: Attitude assessment is a poor testing objective, because attitudes are not quantifiable. Efforts to avoid what is mistakenly thought to be sexist language ("his") lead to cumbersome sentence structure.

23. IS: (C.7)

SB: (omit)

WHY: The only RP staff duties mentioned that are relevant to the document (those involving RPT) are not at all exclusive to that group, and are, in fact, atypical of RP staff duties at Commonwealth Edison.

24. IS: (C.8., paragraph 2, item c.)

IS: "A specific description of all"

SB: "Identification of"

WHY: References to outlines preclude the need for description in the trainee-specific records. The necessity is identification.

25. IS: (C.8., paragraph 2, item d.)

SB: (omit)

WHY: Unnecessary data. Either the trainee has satisfactorily completed the training, or he has not. In the latter case, there should be no record at all for transmittal to other locations.

26. IS: (C.8., paragraph 2, item e.)

SB: (becomes item d.)

WHY: (See above.)

27. IS: (C.8., paragraph 3, sentence 1)

IS: "items a, b, c, d, and e"

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SB: "items a, b, c, and d"

WHY: (See above.)

28. IS: (C.8., paragraph 3, sentence 3)

SB: (omit)

WHY: Repeats the idea put forth in paragraph 1 of this section.

29. IS: (Table 1, item 4.a.)

SB: (omit)

WHY: Not relevant to training in emergency preparations for the individual worker.

30. IS: (Draft Value/Impact Statement, 1.3.3.)

SB: (add after paragraph 1)

"The proposed action will significantly increase the time necessary to prepare transient workers for their assigned tasks. Such workers are typically utilized in considerable numbers over the relatively short time span of the refueling and/or maintenance outage. Additions of time and effort to the training and evaluation processes for each trainee will accumulate synergistically to significantly decrease the throughput of the training function during this crucial period, resulting in possible outage extension and commensurate economic impact."

"The tendency to minimize such economic impact could cause a favoritism toward use of existing trained workers over the alternative of training additional workers. This would result in the collective dose for the outage being allocated among fewer workers, with each worker having greater exposure. Experience shows that exposure increase is truly cost increase."

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