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PROPOSED RULE

Reg. Guide
- Misc. Notice

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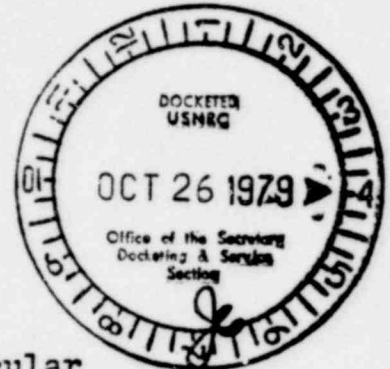
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October 16, 1979

Secretary of the Commission
U.S.N.R.C.
Washington, D.C. 20555

Attention: Docketing and Service Branch

Gentlemen:



As a health physics professional with particular interest in radiation protection training programs, I wish to comment on your recent Draft Regulatory Guide concerning this subject.

I wholeheartedly support structured guidance in this matter. Lack of complete and adequate training at nuclear power plants and lack of consistence and continuity from one facility to the next and even within a single facility cause serious problems and gaps in worker knowledge and his ability to perform safely and affectively. This consistantly leads to excessive exposure and expenditure.

I have had experience in developing and implementing Radiation Protection Training Programs and I feel the following problems are worth mentioning:

1. Management may be unwilling to spend the time and money for a well developed training program. These are the same managers who have not committed to the A.L.A.R.A. concept - I'm sure you are familiar with this problem. A complete understanding of the need for and benefits which may be derived from a good training program should be explained and emphasized followed by rigouous reinforcement.

2. As your draft suggests, there could be substantial redundancy in training workers who travel from one facility to another. Ideally, general training at one facility should be credited to the next facility within a fixed time linitation with the understanding that retraining is required for plant-specific details.

Acknowledged by card. 10/29... *dlh*

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Unfortunately, however, those responsible for employee training cannot be certain that previous training at other facilities was sufficient and up to standard. I feel that there is a need for some process of certifying a facility's training program - and certifying that each worker successfully completed that training program. Without a reliable assurance of this type, I would hesitate to credit the worker for previous training since most of the training programs I have observed have been, in my opinion, very inadequate. This function could be most reasonably performed by N.R.C.

As a person who has both worked in nuclear power plants as a radiation monitor and as a classroom instructor in radiation protection, I would like to point out some practical problems which must be faced when training workers. This applies mostly to workers from craft trades (probably the largest group of workers in nuclear power plants).

1. While most craftsmen are truly affective and conscientious in their line of work, they are not always able to function well in a classroom situation, especially when the course of instruction concerns scientific theories rather than the physical facts they are accustomed to dealing with. With the proper approach to this problem, most workers can grasp the basics necessary to perform well and safely in the plant. However, for most workers, I feel it would be improper to try to train them to perform functions (especially health physics functions) which should be left to trained Health Physics technicians. The old saying "a little knowledge may be dangerous" applies here. I am speaking specifically of your indication in the draft that workers should be trained to "...participate in the measurement and control programs..." (p. 6, para. 5.2). Table 1, page 13 includes (2.k.) "Radiation measurement and

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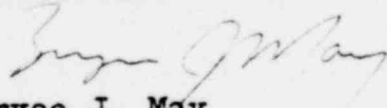
survey instruments," and (2.L.4.) "Avoiding sample contamination."

While it is important that each worker be familiar with these items, it is even more important that the worker not be expected to, be allowed to, or take it upon himself to evaluate radiation conditions and act on his own without the supervision of a trained professional. I feel happily successful if I can train some workers with limited communication skills to be competent and safe doing their own job in the plant, say nothing of expecting them to learn the techniques of Health Physics.

Finally, I would like to take this opportunity to point out what must be an oversight in Table 1, "Appropriate subjects for A Radiation Protection Training Program." Somewhere either in the Measurement & ~~Control~~ or Radiation Protection Program sections, mention should be made of Internal Deposition and Exposure - as it relates to exposure and respiratory protection.

I appreciate this opportunity to review what I feel will be an important Regulatory Guide. I remain available for further discussion if you find it useful.

Sincerely,


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Certified Health Physics Technologist

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