



HEALTH PHYSICS SYSTEMS, INC.

2727 N.W. 43RD ST.
GAINESVILLE, FLORIDA 32605
[904] 373-6066



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

October 23, 1979

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

Attn: Docketing and Service Branch
Division 8

RE: Response to Regulatory Guide
Task - OH 717-4

Dear Sirs:

I have enclosed by comments on above regulatory guide. I hope they will be part of your concern during finalization of this guide.

If I can explain any of my criticisms clearer to you, please contact me.

Sincerely,
HEALTH PHYSICS SYSTEMS, INC.

J. A. Capella
President

JAC/baa

Enclosure

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

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RESPONSE TO REGULATORY GUIDE

GENERAL RESPONSE

This proposed guide does not achieve its intended purpose. I have provided a summary review of each position and have tried to cover its strengths and weaknesses. If guidance is to be provided then it must be helpful. Select and categorize the individuals to be trained. Suggest the levels of training required and the mechanism to prove competency in these levels. Finally, provide the content, on a criteria base, that must or should be known.

POSITION 2

10-CFR-19

Defines a radiation worker as "anyone engaged in activities licensed by the commission and controlled by the licensees, but does not include the licensee." In Position 2, you define those individuals who should receive training. Yet, 10-CFR-19, divides those transient workers from the licensee's permanent employees.

POSITION 3

Objectives

The objectives stated are ideal in light of the regulatory guidelines proposed. None could be achieved routinely, where we to employ the guidelines given. This is evident from the suggested content and the ability level of the trainee to whom it is directed.

POSITION 4

Timing

This is an excellent approach and should include the ability for plants to accept certain training done by other institutions or plants.

POSITION 5

Content

This section is the main reason you will not be able to use this guide as a reference to develop programs. It points out two (2) content

1367 349

areas 5.1 and 5.2 and four (4) program areas 5.3, 5.4, 5.5, and 5.6. Why did you go to programs - stay with content. This is an area we all want to know "what to teach who?".

POSITION 6

Evaluation

All training and evaluations should be done on the premise of proven competency and cognitive information, retention and understanding.

POSITION 7

The RPT personnel must not only be conversant, but must have some given knowledge level and competency, not just the supervisor but technicians also. Therefore RPT must be different than others - here is an excellent opportunity to support ANSI 18.1 by settling down those criteria that make a RPT person a technician, a welder, etc.

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SUGGESTED REGULATORY GUIDE FOR TRAINING

1. Define a radiation worker into classes:
 - a. permanent plant staff
 - b. transient worker
 - c. limited occasional visitor
 - d. H.P. transient or permanent
 - e. etc.

2. Define what information and/or training they need to have:
 - a. Level I
 - b. Level II
 - c. Level III

3. Relate level to worker class:
 - a. permanent staff - Level II
 - b. transient worker - Level I
 - c. limited occasional visitor - Level I
 - d. H.P. and operators - transient H.P. - Level III

4. Define content to be taught at each level:

This is the most important section because this is where the guidance should be given. I do realize that what is said here will be taken as a minimum but it must be said.

For Example:

Level I according to your Table 1 should be an overview of those areas suggested. It is not essential for those persons to know the mechanisms of radio biology, man-rem risk or the other specific items only to know the hazards and the protection mechanisms and the procedures.

On the other hand it is essential that Level III persons know in detail all of the health physics principles and practices including such concepts as ALARA, use of Mockups, etc.

1367 351

- Select the criteria to qualify each level
- Require Level I training in plant
- Require Level's II and III as a preventive to employment or retrofit
- Previous plant experience is no measure of subject knowledge and or understanding basic principals demonstrated ability or knowledge
- Require training at Levels II and III be approved or certified. Use a competency based training model to prove cognitive skills
- Accept Level's II and III from other plants. If personnel from plant X are qualified accept their credentials as previous training and not retrain

Now you have a true training requirement for all personnel.

The Key is "who must know what?"

1367 352