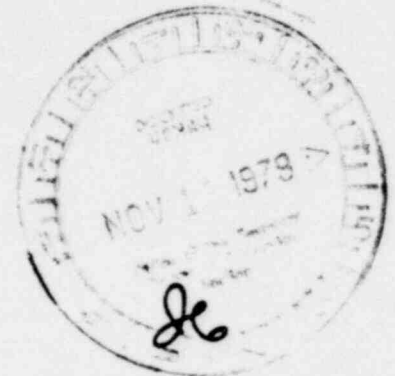


November 5, 1979

PROJECT NUMBER
PROPOSED ROLE PR - Misc. Notice
Reg. Guide

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



ATTN: Docketing and Service Branch

REF: Regulatory Guide for Comment
Task OH717-4

Gentlemen:

The following comments are submitted on the draft document "Radiation Protection Training for Light-Water-Cooled Nuclear Power Plant Personnel", Task OH717-4.

The Nuclear Regulatory Commission is to be commended in its effort to establish a position regarding acceptable training programs. Those who have participated in drafting this document have undoubtedly discovered that training is a very complex phenomenon that we have yet to fully understand. My comments are based on over 10 years experience in radiation training with academic credits at the master's level in radiation sciences and a master's level in adult learning processes in progress.

I am more convinced than ever that properly developed and conducted training is the life key to any industry. I also believe that even we training professionals are very inadequate when dealing with long term, low risk health and safety considerations.

First, in order, are a few assumptions about the adult learner that need to be stated:

- . No evidence exists, to the best of my knowledge, to support the claim that instruction in radiation protection (ALARA) produces a changed behavior on the job consistent with ALARA. The point is that not a single radiation worker position has ever been evaluated to develop an ALARA Competency model of job behavior. This is an absolutely necessary step since all training and evaluation will be based on "doing the job right". Without a model (a performance standard) the NRC, the licensee, the trainee, have nothing but subjective observation upon which to base the adequacy of training.
- . No evidence exists that a worker understanding the risk of radiation is motivated to change a job behavior so as to reduce individual risk.

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- . No evidence exists to support the claim that essay and calculational questions are of greater test value than are multiple choice or true/false questions.
- . No evidence exists to support any assignment of training hours (such as 40 hours for a new worker) and job behavior performance. Evaluation of the presently conducted programs can not be demonstrated and assigning hours to standardize instruction does not change the fact that evaluation of radiation training in terms of job behavior is void in the entire industry.

While this document may appear to be a method of defining an acceptable training program, I believe it is greatly misleading and, in fact, will contribute to false security about training as has been demonstrated at so many nuclear facilities.

I believe that the drafters of this document dealt with many of the known variables in the training process. Classroom instruction to input knowledge, on-the-job instruction and performance testing to demonstrate skills, and a must in every program is job behavior observation and evaluation as part of the training program. Why train if the desired job performance is not evident?

I could comment on every paragraph of the document but to do so without the opportunity of response from the drafter of the document is not an efficient use of time. I would strongly encourage the NRC to invite comments from professional societies involved in training -- such as the American Society for Training and Development. Their expertise and experience could avoid a regulation that is well intended but of little training value.

These views are my own personal views and do not reflect those of Nuclear Support Services, Inc. I hope to have the chance to express my views in person and I greatly endorse your efforts.

Have a nice day.

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Sincerely,

Bonnie J. Decker
for

W. Larry Petcovic

Manager

Training Resources Division

Nuclear Support Services, Inc.

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WLP/bj

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