

OH 717-4



SMUD

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

September 19, 1979



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

Attention: Docketing and Service Branch

Subject: Comments concerning Task OH 717-4 "Radiation Training
for Light-Water-Cooled Nuclear Power Plant Personnel"

Dear Sir:

The Sacramento Municipal Utility District welcomes the Nuclear Regulatory Commission's assistance by providing guidelines for the radiation protection training for Light-Water-Cooled Nuclear Power Plant personnel with the issuance of draft Regulatory Guide Task OH 717-4.

The Sacramento Municipal Utility District intends to use the draft and final regulatory guide to improve its present training program. This will be tempered with the District's responsibility to the people of the Sacramento Area to provide low cost electrical power rather than attempting to rectify any educational deficiencies in mathematics or writing skills that someone might have that is reporting to work at Rancho Seco.

The following comments are submitted for the Commission's consideration before the final regulatory guide is issued.

General Comments:

The draft regulatory guide does not appear to consider the fact that most of the contractor personnel reporting for work before a fueling outage do so just before the outage and are expected to actually start working soon after their arrival.

In order to provide a one-week training program for workers that have never before had radiation protection training by starting a new class of 50 trainee's each week, twelve weeks would be required to complete the training of 600 contractor personnel. To start a one week training program more frequently than once a week would require training facilities and an instructor staff beyond reasonable expectations for a single unit Nuclear Power Plant.

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Acknowledged by *10/22* *g* 1743 225

Specific Comments:

Item 1 1. General Page 3

A week or more of training for workers without prior training in radiation protection is unnecessary and is not realistic from a refueling outage scheduling standpoint.

Item 2 5. Radiation Protection Program Content Page 5

It is reasonable to make trainees aware of the availability of reference documents used to create a training program, but it is not reasonable to expect that providing each trainee with individual copies of such material would have any impact in reducing radiation exposure.

Item 3 5.2 Measurement and Control of Radiation Exposure and Radioactive Material Page 7

All personnel that meet the Security and Training requirements have essentially unlimited access to all plant areas. The radiation work permit procedure provides for continuous coverage by Health Physics personnel when radiation levels exist, which could result in high exposures. It is not reasonable to require everyone authorized access to all areas of the plant to have a detailed knowledge of the sources of radiation and radioactive materials associated with all plant systems, although it is reasonable that the Health Physics personnel providing coverage on jobs have this level of knowledge.

Item 4 6. Evaluation of Trainee Performance Page 9

Individual oral testing is impractical when 500 to 600 contractors are being trained in preparation for a refueling outage. Oral testing may be appropriate when evaluating the reason a trainee has failed a written exam.

Item 5 6. Evaluation of Trainee Performance Page 10

Essay and calculational questions assume a prerequisite knowledge of mathematics and writing skills which are beyond the control or responsibility of the licensee in consideration of current contractor labor contracts.

Item 6 6. Evaluation of Trainee Performance Page 10

In order to take an individual's job responsibilities, previous training and radiation protection experience into consideration, each written test would have to be different for each trainee and could not be prepared until after the trainee's arrival at the site and these factors determined. A radiation protection test should determine that an individual has the minimum knowledge necessary for authorization to enter restricted areas without escort rather than a test to determine the upper limit of the individual's knowledge or radiation protection.

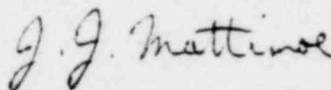
Item 7 6. Evaluation of Trainee Performance Page 10

Any test that attempts to determine a person's attitude toward radiation, or any other subject, would be a psychological evaluation. That might be appropriate in determining a person's acceptability from a security standpoint but not in a radiation protection test.

Item 8 8. Records Page 11

In order to clearly and explicitly describe all training received by an individual, each licensee would have to supply every other licensee with outlines, syllabi, brochures, video tapes, texts, tests and update this material when changed. It would be more reasonable to test an individual that claims to have previous radiation protection training and to exempt any individual from all but plant specific training if they successfully pass such a test.

Respectfully submitted,



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and Chief Engineer

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