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MEMORANDUM FOR: Karl R. Goller, Assistant Director for Operating Reactors
 Division of Operating Reactors

FROM: Brian K. Grimes, Chief, Environmental Evaluation Branch,
 Division of Operating Reactors

SUBJECT: RESPONSE TO DUKE POWER COMPANY LETTER REGARDING RADIATION
 PROTECTION MANAGER (TAC - 6888)

In a Duke Power Company letter to Rusche, dated May 13, 1977 (Attachment 1), the licensee takes exception to the NRC position with respect to the qualification of the onsite Radiation Protection Manager (RPM) (Attachment 2), as recommended by Regulatory Guide 1.8. Duke proposes to use the guidance specified in ANSI 18.1, 1971 (Attachment 3).

We have reviewed Duke's position and recommend the response to them as shown in Attachment 4. We feel that the ANSI 18.1, 1971 standard does not provide the appropriate qualifications required for the onsite RPM whose responsibility is to manage a radiation protection program with an impressive annual man-rem budget. For example, personnel exposures from all three units at the Oconee Station were 517 man-rem in 1974, 457 man-rem 1975, and 990 man-rem in 1976. Although these values are not unique in the nuclear power reactor industry, they are still impressive with respect to all other nuclear facilities. Consequently, they should be managed by professional experts who are at the station to assure that exposures from normal operations, maintenance, etc. are maintained at levels that are as low as is reasonably achievable (ALARA).

The licensee claims that the RPM presently assigned at Oconee meets the qualification specified in ANSI 18.1, 1971. He therefore should provide a commitment that his successor will be qualified in accordance with Regulatory Guide 1.8. We do not feel that Duke will suffer an unnecessary hardship under these circumstances since industry response to Attachment 2 has otherwise been positive.

Original Signed by

Brian K. Grimes

Brian K. Grimes, Chief
 Environmental Evaluation Branch
 Division of Operating Reactors

cc: See following page

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