

OCT 11 1977

MEMORANDUM FOR: Jack Sutherland, Chief, FFMS Branch, Region II

FROM: L. J. Cunningham, Acting Asst. Director, FFMSI
IE: HQ

SUBJECT: DUKE POWER COMPANY-RADIATION PROTECTION MANAGER

Enclosed for your information is a proposed response to Duke Power Co.
from DOR regarding qualifications of Radiation Protection Managers.

18

L. J. Cunningham, Acting Asst. Director
Division of Fuel Facilities and
Materials Safety Inspection
Office of Inspection and Enforcement

Enclosure:
As stated

cc: L. B. Higginbotham

CONTACT: L. J. Cunningham
49-28188

50-269/270/287

772900191

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OFFICE	FFMSI					
SURNAME	L. J. Cunningham	per				
DATE	10/11/77					



Copy to R.E. to [unclear]

AUG 29 1977

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.

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

cc: See following page

Contact: S. Block, EEB/DOR
X28066

Dupe
8001030953



Docket No. 50-

Licensee

Gentlemen:

RE:

We note that your facility technical specifications do not require that the individual performing the function of Radiation Protection Manager (RPM) meet the minimum qualification requirements of Regulatory Guide 1.8, September 1975. As stated in this guide, it is the NRC position that if the RPM is reassigned or the incumbent replaced, the new RPM should have qualifications equivalent to those stated in this guide.

To implement this provision, we request that you determine if the individual performing the function of Radiation Protection Manager meets the minimum qualifications of Regulatory Guide 1.8, September 1975. In the event the RPM is so qualified, you should propose a technical specification to be included in the Administrative Controls Section which states that "the RPM (or equivalent position title) shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975".

In the event you determine that the present incumbent does not meet the minimum requirements of the guide, you should advise us of this fact and provide a written commitment that the successor to the incumbent will be so qualified and that you will propose a technical specification to that effect at that time.

The above action should be completed within 60 days of receipt of this letter. In the event you should desire further discussion of this matter, please contact us.

Sincerely,

, Chief
Operating Reactors Branch #
Division of Operating Reactors

cc: See next page