

November 12, 1990

Mr. Michael Rossler
Edison Electric Institute
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2696

Dear Mr. Rossler:

As a result of a number of questions from utility representatives during the recent meeting of the EEI Health Physics Group in Long Beach, California, Mr. James E. Wigginton of my staff promised to provide copies of NRC documents that clarify certain NRC policies, requirements, and guidance. These NRC documents are enclosed and are listed below under the topics to which they are relevant:

1. Qualifications of Health Physics Technicians
 - a) Letter from L.J. Cunningham, NRC, to J.C. Quick, Nuclear Support Services, Nov. 2, 1978.
 - b) Letter from W.M. Morrison, NRC, to B.E. Leonard, Institute for Resource Management, Inc., Aug. 26, 1980.
2. Applicability of Generic Letter 82-12 to Radiation Protection Staff
 - a) Memo. from W.D. Shafer, NRC, to L.J. Cunningham, NRC, March 2, 1988.
 - b) Memo. from L.J. Cunningham, NRC, to W.D. Shafer, NRC, April 1, 1988.
3. Enforcement Policy for Hot Particle Exposures - Answers to Three Questions

Memo. from L.J. Cunningham, NRC, to J.H. Joyner, et al., NRC, November 9, 1990.

If you have any questions on these documents, please contact me or Mr. Wigginton.

Sincerely,

/s/
LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

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NOV 2 1978

Mr. Joe C. Quick, President
Nuclear Support Services, Inc.
14055 Jefferson Davis Highway
Woodbridge, VA 22191

Dear Mr. Quick:

Thank you for your letters about the NSS Qualification Plan, including copies of the relevant NSS documents, TQ-7030 and QA-6030. You have obviously given a lot of thought and attention to the problems involved in meeting the intent of Regulatory Guide 1.8. The relevant ANSI standard, ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," is about to be updated and re-issued as ANSI/ANS 3.1-1978, with the same title. A copy may be obtained from the American Nuclear Society, 555 North Kensington Avenue, La Grange Park, Illinois 60525.

In general, we must take the position that all contract health physics staff when working under contract to our licensees, meet the provisions of ANSI/ANS 3.1, as adopted by Reg. Guide 1.8. Work is currently underway to revise that Guide, adopting ANSI/ANS 3.1-1978, with certain conditions. That revision is currently scheduled to be issued for comment in the early spring of 1979.

We have compared the provisions of the two NSS documents with the guidance in our Reg. Guide and in the ANSI/ANS Standards. We conclude that your documents, TQ-7030 and QA-6030 are, for the most part, in acceptable conformance with that guidance. The only exceptions relate to the provisions at Section 4.5.2 in ANSI N18.1-1971 and in its current updating, ANSI/ANS 3.1-1978:

- (1) The current standard (ANSI 18.1) states that technicians shall have a minimum of two years of working experience in their specialty, and should have an additional year of related technical training. Assuming that the term "related technical training" includes academic training in health physics, one year of training would be equivalent to about 500 academic hours.

In your TQ-7030, Section 4.3, the first four sub-sections meet the years of working experience requirement; the fifth, 4.3.5 does not. Only the fifth meets the suggested related technical training provision.

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- (2) The revised standard (ANSI/ANS 3.1) states that technicians shall have three years of working experience, of which one year should be related technical experience.

In your TQ-7030, Section 4.3, the first three sub-sections meet the years of working experience requirement; the fourth and fifth, 4.3.4 and 4.3.5, do not. Again, only the fifth meets the suggested related technical training provision.

- (3) As noted in (a) below, we have recommended that equivalent qualification credit be given for one year of working experience and for one year of formal schooling. If this change were to be made, the first three sub-sections would meet the working experience requirement; the fourth and fifth would not, although the fifth would then meet the related technical training provision.

With regard to the specific questions raised in your letter of July 5, 1978, we have the following comments:

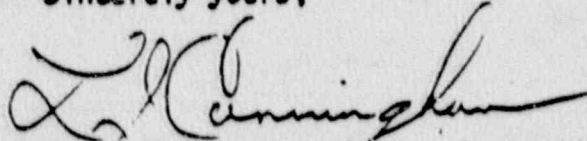
- a. We agree with the IIS position that an individual with an associate degree in health physics and one year of experience is likely to be as good or better than an individual with no formal schooling and three years of experience. We have recommended that Section 4.5.2 in ANSI/ANS 3.1 be adopted in Reg. Guide 1.8 such as to give equivalent qualification credit for one year of relevant experience, and one year of formal schooling. However, this change, if everyone agrees, would not take place until all comments on the Guide are in and it is issued in final form.
- b. The question of what should determine a year of experience relates to two observations about transient health physics workers:
1. They often work long shifts with no days off--thus accumulating many hours of "experience" in less than one calendar year.
 2. They are typically employed at such work for less than nine months during any given year.

We are reluctant to accept any criterion that might encourage excessive overtime hours--with the likely increase in fatigue.

decrease in worker efficiency, and the resulting additional risks on the job. A possible guideline for equivalency of one year experience might be: 2000 or more working hours, accumulated during a total period of not less than 40 weeks at assignments to nuclear plants.

- c. ANSI/ANS 3.1, page 1, clearly defines nuclear power plant experience and the conditions under which other kinds of experience may be substituted.
- d. The licensee is responsible for the determination that a temporary health physics technician job assignment is in accordance with the relevant guidance, regardless of the position title. The NRC performs audits to assure the licensee implements the responsibility.

Sincerely yours,



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

bcc: T. Murphy
J. Nehemias



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 26 1980

Dr. Bobby E. Leonard, President
Institute for Resource Management, Inc.
428 Fourth Street, Eastport
Annapolis, Maryland 21403

Dear Dr. Leonard:

Your letter of June 12, 1980 to Mr. Richardson of the NRC staff requested a clarification of the experience requirements for qualification of individuals in accordance with the guidance in Regulatory Guide 1.8, "Personnel Selection and Training." You specifically requested information on calculation of manhours credit for application to years of experience with regard to health physics or radiation protection technicians.

The NRC staff recognizes that contractor health physics technicians are utilized at many of the power reactor facilities and that considerable overtime is frequently associated with this work. In consideration of this situation, members of the staffs of the Office of Nuclear Reactor Regulation and the Office of Inspection and Enforcement developed guidance for the application of manhours to years of experience for use only in determining the qualification of contractor health physics technicians. This guidance recommends that 2,000 or more working hours accumulated during a total period of not less than 40 weeks be acceptable as representing one year of experience. The further breakdown to hours per week is not discussed nor is it appropriate to evaluate work on a week-by-week basis. I'm not aware of any other guidance of this type that has been established for determining the qualifications of any other members of the plant staff.

The type of work performed by individuals is very important in determining whether credit should be allowed towards meeting requirements for years of experience. Obviously, if work experience is solely in a job of very limited scope, then it would not be acceptable for meeting the years of experience requirement. Furthermore, work experience is only one of several criteria which must be met for qualification. Experience, education, training and demonstrated proficiency are all requirements for qualification.

Your letter also points out that the NRC Office of Inspection and Enforcement has recently issued Circular 80-02 which provides for limitations on working hours of 72 hours per week. The guidelines of Circular 80-02 are included to establish maximum allowable limits on working hours and that actual working hours under normal conditions are expected to be less and not be continuously extended to the maximum allowable. This guidance is for an entirely different purpose than that discussed above and as such is not contradictory.

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An opportunity for public input on this question will be afforded in the near future when Regulatory Guide 1.8 is issued for public comment, at which time the NRC will review comments received and changes in the guide may be made in this regard.

W. M. Morrison

W. M. Morrison, Assistant Director
for General Engineering Standards
Division of Engineering Standards
Office of Standards Development