



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

JUL 10 1986

Department of the Navy
Naval Sea Systems Command Detachment
Radiological Affairs Support Office
(RASO)
ATTN: P. J. Durfee, CDR
Officer in Charge
Yorktown, Virginia 23691-5098

Gentlemen:

This refers to your letters dated March 4, 1985, April 22, 1985, September 24, 1985, November 22, 1985, and April 14, 1986. In the letters you provide clarification of training and experience requirements for radiation safety officers at Navy radiography activities and request that we approve a radiography radiation safety officer training course.

We have reviewed the information in your letters and find the proposed training program acceptable for licensing purposes. On June 13, 1986, we provided Mr. Lowman of your staff with a status report concerning your proposal.

Concerning the two training courses (A-4J-0016 and A-4J-0020) described in your letters, we believe that RASO's current license, 45-07740-04, should be amended to include both courses. We understand that RASO will be requesting authorization for a radiography source and device by August 1986. Information describing the two courses should be included in the amendment request. Reference to information submitted in the letters identified above would be acceptable. However, you should also include an updated outline for course no. A-4J-0016 (which we understand is currently under revision) and copies of sample tests, quizzes and performance check lists for course no. A-4J-0020.

You have identified two individuals who will be instructors and provide "hands-on" training in course no. A-4J-0020. While we note the two individuals have recently attended radiography training courses and have some "hands-on" experience, we continue to believe that a qualified, well experienced radiographer would contribute much to the training program. We also note that our position is shared by Navy's NDT School, Service School Command, San Diego, in their letter to you dated March 9, 1984 (enclosed with your September 24, 1985 submission). We understand, of course, that you are attempting to add a qualified radiographer to your training staff, but that this is a prolonged process which may not be completed in the near future. Perhaps an intermediate solution would be a qualified guest lecturer who could provide additional radiography expertise to your training program. We would appreciate hearing your views on this possibility.

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Attachment to Enclosure (1)

Our understanding of your minimum training and experience requirements for Radiography Radiation Safety Officers (RRSO's) is stated below. These items should be clearly spelled out in the RASO license application.

1. All RRSO's, regardless of prior training and experience or Naval activity with which associated, will successfully complete course no. A-4J-0016.
2. All RRSO's, except military personnel assigned to Shore Intermediate Maintenance Activities or radiography facilities afloat (Naval Tenders), will meet the training and experience criteria for individuals responsible for radiation safety program (Item 7) of proposed Revision 2 to Regulatory Guide 10.6, "Guide for the Preparation of Applications for the Use of Sealed Sources and Devices for Performing Industrial Radiography," dated October 1984. Please note that the Guide specifies such individuals should have a minimum of one year actual experience as a radiographer.

We will consider exceptions to the experience criteria case-by-case based upon additional radiation safety training and experience individuals may have obtained. However, certain duty restrictions, as outlined in Item 4 below, may also be imposed.

3. The excepted military personnel identified in Item 2 above will successfully complete course no. A-4J-0020. Certain duty restrictions, as outlined in Item 4 below, will also be imposed.
4. Any Navy activity where the RRSO does not meet the training and experience criteria outlined in Item 7 of proposed Revision 2 to Regulatory Guide 10.6 will also appoint an individual as Assistant Radiation Safety Officer (ARSO). The ARSO will be the(a) "Senior Radiographer" at the activity and will have a minimum of one year actual experience as a qualified gamma radiographer. The ARSO at these activities shall have primary responsibility for source exchange and leak testing operations, recovery of damaged, disconnected or lost radiographic sources, other radiography equipment malfunctions, or any other operation which involves manipulation of the source. In addition, we suggest that the ARSO have primary responsibility for conducting quarterly equipment inspection and maintenance operations and be significantly involved in the quarterly internal inspection program.

We anticipate that all future radiography licensing actions, and the application to consolidate the Navy license into a single broad license, will include the minimum requirements identified above, as appropriate. Also, should our regulations or guidance change concerning RRSO's, you will be expected to modify your minimum requirements accordingly.

In conclusion, while we have determined that the exception for military personnel is acceptable, we wish to stress the importance of the criteria outlined in Regulatory Guide 10.6. Whenever possible, the Navy should try to appoint RRSO's who meet our recommended criteria. On the other hand, we commend the Navy for providing specialized RRSO training to its personnel. We have seen a number of cases where a licensee, whose personnel were well qualified radiographers, had compliance problems because they lacked knowledge of certain Nuclear Regulatory Commission or Department of Transportation requirements which are not normally discussed in sufficient detail during radiographer training. With this in mind, we wonder if course no. A-4J-0020 would be helpful to all RRSO's.

If you have any questions, please contact me or Bruce Carrico at (301) 427-4238.

Sincerely,

A handwritten signature in dark ink, appearing to read "Randy L. Miller", with a long horizontal flourish extending to the right.

Randy L. Miller, Chief
Material Licensing Branch
Division of Fuel Cycle and
Material Safety