ENCLOSURE 2

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

JAN 21 1982

MEMORANDUM FOR: Lemoine J. Cunningham,
Engineering & Technical Support Branch
Division of Engineering & Quality Assurance, IE

FROM: Douglas M. Collins, Leader
Radiation Protection Section
Radiological Assessment Branch, DSI

SUBJECT: QUALIFICATION OF RADIATION PROTECTION TECHNICIANS

In response to your request, enclosed are SERs and questions to applicants regarding the qualification of radiation protection technicians and the separation of radiation protection and chemistry functions. It has been our position that if radiation protection and chemistry are not separate functions organizationally, the licensee or applicant must implement a program to provide adequate technical supervision of the radiation protection function and full qualification of radiation protection technicians in their speciality - radiation protection.

Most plants' staffs are required to meet the qualification standards of ANSI 18.1, which requires 2 years of experience in a technician's speciality. The standard lists radiation protection and radiochemistry as separate specialties. It has been our position that this requires radiation protection technicians to have 2 years experience in radiation protection to be fully qualified. There may be areas that are common to both radiation protection and chemistry, (e.g., sampling and sample analysis), and we expect inspectors will exercise judgment when evaluating technician experience.

We have approved applications for technical specifications that require technicians to complete an NRC-approved technician qualification program. These programs have been equivalent to the program outlined in NUREG-0761 and have included a requirement for 1 years experience.

Douglas M. Collins

Douglas M. Collins, Leader
Radiation Protection Section
Radiological Assessment Branch
Division of Systems Integration

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ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

THREE MILE ISLAND UNIT NO. 1

RADIOLOGICAL FIELD OPERATIONS TRAINING PROGRAM

Introduction

Section 6.3.2 of the Technical Specifications for TMI-1 specify that "Each Radiological Controls Technician/Foreman shall meet or exceed the qualifications of ANSI-N 18.1-1971...or be formally qualified through an NRC approved TMI-1 Radiation Controls Training Program". In accordance with this specification, GPU Nuclear, the licensee, on February 25, 1982 provided a description and summary of their radiation field operations training program which we have evaluated as set forth below.

Evaluation

The subject program is a proposed alternative to qualification in accordance with ANSI-N 18.1-1971, "Standard for Selection and Training of Personnel for Nuclear Power Plants". ANSI 18.1 specifies that the technicians have two years experience in their specialty and that they must have the combination of education, experience and skills necessary to perform assigned functions during normal and abnormal conditions. This standard also recommends that technicians have 1 year training, but does not specify the content of the training.

As an alternative to the general experience criteria of ANSI 18.1, the licensee has proposed, in a letter dated February 25, 1982, a comprehensive training and qualification program. This program includes theoretical and practical training in all necessary concepts and duties to be performed, written and oral examinations, and records of training and qualification. The qualification program will be applicable to licensee staff; contractor personnel will be trained in the procedures applicable to their specific duties. The Technical Specifications require that contractor technicians in responsible positions be qualified in accordance with ANSI 18.1 if they do not complete the licensee's qualification program.

We have reviewed the licensee's program and find it to be equivalent to that proposed by the NRC staff in draft NUREG-0671, "Radiation Protection Plans for Nuclear Power Reactor Licensees". We note that, the training program specifies no requirement for experience for the radiological controls staff. We requested and the licensee committed to incorporate a specification for experience for radiological control technicians and foremen, within the proposed qualification program. The experience requirements are that radiological controls technicians are to have at least one year experience and foremen to have at least four years experience in radiological controls. We note that time spent in a radiological controls training program may count towards completion of minimum experience requirements.

Conclusion

We, conclude that the proposed radiological control technician and foremen qualification program, when modified to include a specification for experience, as noted above, will provide the radiological controls staff with the qualifications necessary to perform assigned functions during normal and abnormal conditions and to provide adequate radiological control support to the plant. The modified program will provide training and qualification equivalent to that in ANSI 18.1 and, therefore, is acceptable.

Dated: NOV 17 1982