Dockets: 50-445 50-446

Texas Utilities Electric Company ATTN: M. D. Spence, President, TUGCO Skyway Tower 400 North Olive Street Lock Box 81 Dallas, Texas 75201

Gentlemen:

The purpose of this letter is to request your cooperation in the reduction of time NRC employees spend in generic radiation protection retraining at reactor facilities. As you know, NRC regulation 10 CFR Part 50.70(b)(3) requires that NRC resident and region-based inspectors, who are appropriately identified by the Regional Administrator, be afforded immediate, unfettered access to your facility for inspection activities.

In order to reduce the amount of time spent in training at your facility, NRC Region IV is conducting its own training in the generic aspects of radiation protection. This training includes the essential elements discussed in Regulatory Guides 8.13, 8.27, and 8.29. The NRC considers this training sufficient to relieve the licensee of the generic radiation protection training required by 10 CFR Part 19.12 for NRC inspectors. Testing of NRC personnel will not be required for licensees to demonstrate compliance with the requirements of 10 CFR Part 19.12 or the recommendations of Regulatory Guide 8.27. The NRC Region IV personnel who have successfully completed the NRC training program are identified in the enclosed radiological access list. This list will be periodically revised as changes occur.

In addition to completing the training program, the past work experience of NRC employees will be reviewed before they are placed on the access list. In general, only employees with considerable inspection or operational experience at operating reactors will appear on the access list. NRC employees that do not appear on the access list would be expected to complete your established comprehensive training program.

The NRC Region IV training program does not include qualifications for the use of respiratory protection equipment. NRC employees that would be required to wear respiratory protection equipment during their inspection activities would be expected to successfully complete your respiratory protection training program. NRC Region IV employees would be responsible for providing documentation to demonstrate that a respiratory medical examination has been completed prior to participating in your training program.

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## Texas Utilities Electric Co.

We request that you limit training for those NRC employees identified on the radiation protection qualification access list to a short orientation, as appropriate, on the site-specific aspects of radiation protection, security, and emergency response. This orientation, combined with other entry requirements such as security badging and whole body counting should not delay the inspector more than about 1 hour. The training identified in this letter has been discussed with your training supervisor and plant manager.

I would appreciate your cooperation in this matter. If you have any questions or problems in tailoring your site-specific training to meet the access needs of the NRC, please contact Mr. Blaine Murray at 817/860-8126. We would like to implement this abbreviated onsite training by March 15, 1985.

> Sincerely, Original Signed by: Paul S. Check for

Robert D. Martin Regional Administrator

Enclosure: As stated

cc:

Texas Utilities Electric Company ATTN: B. R. Clements, Vice President, Nuclear Skyway Tower 400 North Olive Street Lock Box 81 Dallas, Texas 75201

Texas Utilities Electric Company ATTN: J. W. Beck, Manager, Licensing Skyway Tower 400 North Olive Street Lock Box 81 Dallas, Texas 75201 R. Jones, Manager, Plant Operations Comanche Peak Steam Electric Station P. O. Box 2300 Glen Rose, Texas 76043

C. Turner, Director of Nuclear Training Comanche Peak Steam Electric Station P. O. Box 2300 Glen Rose, Texas 76043

B. Lancaster, Radiation Protection Engineer
Comanche Peak Steam Electric Station
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Glen Rose, Texas 76043

bcc to DMB (IE06) (Enclosure: for official use only)

bcc distrib. by RIV: RPB1 RIV File RPB2 Texas State Department of Health RRI-OPS EP&RPB RRI-CONST R. Denise, D/DRSP R. Martin, RA S. Treby, ELD D. Hunnicutt, Task Force R. Bangart, D/DRSS V. Noonan, NRR