

March 10, 1988

Docket Nos. 50-445
and 50-446

Mr. William G. Council
Executive Vice President
Texas Utilities Electric Company
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Dear Mr. Council:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING
RADIATION PROTECTION ORGANIZATION

We have reviewed FSAR Amendments 59, 60, 62, and 64 relative to the radiation protection organization for Comanche Peak Steam Electric Station, Units 1 and 2.

In order to complete our evaluation, we have determined that additional information is needed. Please provide the information identified in the enclosure no later than 14 days from the date of this letter.

Should you have any questions regarding this request, please contact either of our Project Managers, Melinda Malloy at (301)492-0738 or Annette Vietti-Cook at (301)492-0737.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not under P. L. 96-511.

Sincerely,
(original signed by)
Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Special Projects

Enclosure: Request for
Additional Information

cc: See next page

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

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Sincerely,

A handwritten signature in cursive script that reads "C I Grimes".

Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Special Projects

Enclosure: Request for
Additional Information

cc: See next page

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Comanche Peak Steam Electric Station
Units 1 and 2

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- 2 - Comanche Peak Electric Station
Units 1 and 2

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Request for Additional InformationComanche Peak FSAR Amendments 59, 60, 62, and 64Radiation Protection Organization

1. Section 13.1.3.1 (Amendment 62) of the FSAR, states "If the appointed Radiation Protection Manager (RPM) does not meet the Regulatory Guide 1.8 criteria, then a Radiation Protection Advisor (RPA) shall be designated who does satisfy the Regulatory Guide 1.8 criteria." Based on information provided in the FSAR (through Amendment 64), a comparison is made below between the Comanche Peak Steam Electric Station (CPSES) RPM candidate's qualifications and the Regulatory Guide 1.8, Rev 1-R criteria:

Regulatory Guide 1.8 Criteria

- ° Bachelor's degree in science or engineering, including some formal training in radiation protection.
- ° A Master's degree may be considered equivalent to one year of professional experience where coursework related to radiation protection is involved.

CPSES RPM Candidate

- ° Bachelor's degree in science (Biology).
No apparent formal training (college-level) in radiation protection.
- ° Master's degree in Chemical Oceanography.
No coursework in radiation protection apparently taken.

- ° At least five years' professional experience in radiation protection, three of which should be in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, preferably in an actual nuclear power station.
- ° At most, candidate has only approximately two years (since 1986) of professional radiation protection experience. All of this experience was gained in an environment lacking actual radiation protection problems due to the plant being in the construction phase.

Based on the above, it appears to the staff that the individual named as RPM for the CPSES (p. 13.1-84 of the FSAR, Amendment 62) does not meet the RPM criteria in Regulatory Guide 1.8, Rev 1-R. Please state how the RPM candidate will obtain the necessary formal training and professional radiation protection experience in order to eventually meet the Regulatory Guide 1.8, Rev 1-R criteria.

2. FSAR Amendment 62 states (as quoted in Question No. 1 above) that an RPA who meets Regulatory Guide 1.8 criteria would be designated in the event that the RPM did not meet the criteria. In view of the staff's conclusion that the RPM candidate does not meet the Regulatory Guide 1.8 qualification criteria (see Question No. 1), the alternative course of action needs to be pursued.

TU Electric has proposed the RPA concept as this alternative. Under this concept, the RPA would report directly to the RPM, closely advising and guiding the RPM on all radiation protection matters. The RPA would have direct access to the Manager, Plant Operations and the Corporate Health Physics Supervisor. Additionally, the RPA would be assigned as an advisor to the Station Operating Review Committee.

The staff finds that TU Electric's proposed arrangement involving a not-yet-qualified RPM supported by an RPM-qualified RPA would be extremely difficult and awkward, if not impossible, to work. An arrangement of this nature might be feasible in situations where the RPM candidate is nearly qualified, e.g., having 3 to 4 of the necessary 5 years of professional radiation protection experience and some formal radiation protection training. However, this does not appear to be the case at CPSES.

Please provide a resume of qualifications for a "Regulatory Guide 1.8-qualified" RPM who can fill the position of RPM until such time as the candidate proposed in the FSAR is determined to be qualified.