



Log # TXX-88657  
File # 10010  
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William G. Council  
Executive Vice President

September 7, 1988

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
REGARDING QUALIFICATION OF RADIATION PROTECTION  
MANAGER CANDIDATE

REF: USNRC letter from Mr. C. I. Grimes to Mr. W. G. Council  
dated August 2, 1988

Gentlemen:

In your letter of August 2, 1988, you concluded that the current Radiation Protection Manager (RPM) did not meet the experience requirements of Regulatory Guide 1.8 (RG 1.8). You further stated that the Comanche Peak radiation protection organization must include an individual who meets the RPM qualification criteria of RG 1.8 and has a specified minimum scope of responsibility. This information was requested by August 15, 1988; however per a telecon between R. D. Walker and C. I. Grimes, this date was extended to September 7, 1988.

In response, TU Electric proposes to create the new position of Assistant Radiation Protection Manager (Attachment 1) and to appoint to that position an individual who satisfies your qualification criteria, which includes the RPM qualification criteria of RG 1.8.

The Assistant RPM will report to the RPM. His responsibilities will include the following:

1. Directing the day-to-day activities of Radiation Protection Health Physicists and Engineers, interfacing directly with Radiation Protection first line supervision and providing technical expertise in all aspects of radiation protection. Additionally, he/she will be given stop-work authority where radiation protection issues are involved.
2. Reviewing and approving radiation protection procedures.
3. Participating in the Station Operations Review Committee as a member.

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In general, the Assistant RPM will have technical responsibility for radiation protection programs including their implementation. We will revise the appropriate procedures to require the Assistant RPM's review and approval of significant radiation protection activities beyond the routine activities carried out by the Radiation Protection Supervisors or the health physicists or engineers on his/her staff. Enclosure 1 provides a more detailed listing of the responsibilities of the Assistant RPM.

TU Electric will assign an RPM-qualified individual to the position of Assistant RPM at least 6 months prior to Unit 1 fuel load. It is our intention to submit the applicable FSAR and Technical Specification changes and a detailed statement of qualifications of this individual at the appropriate time.

Very truly yours,

*W. G. Council*

W. G. Council

By: *J. S. Marshall*  
J. S. Marshall  
Generic Licensing Manager

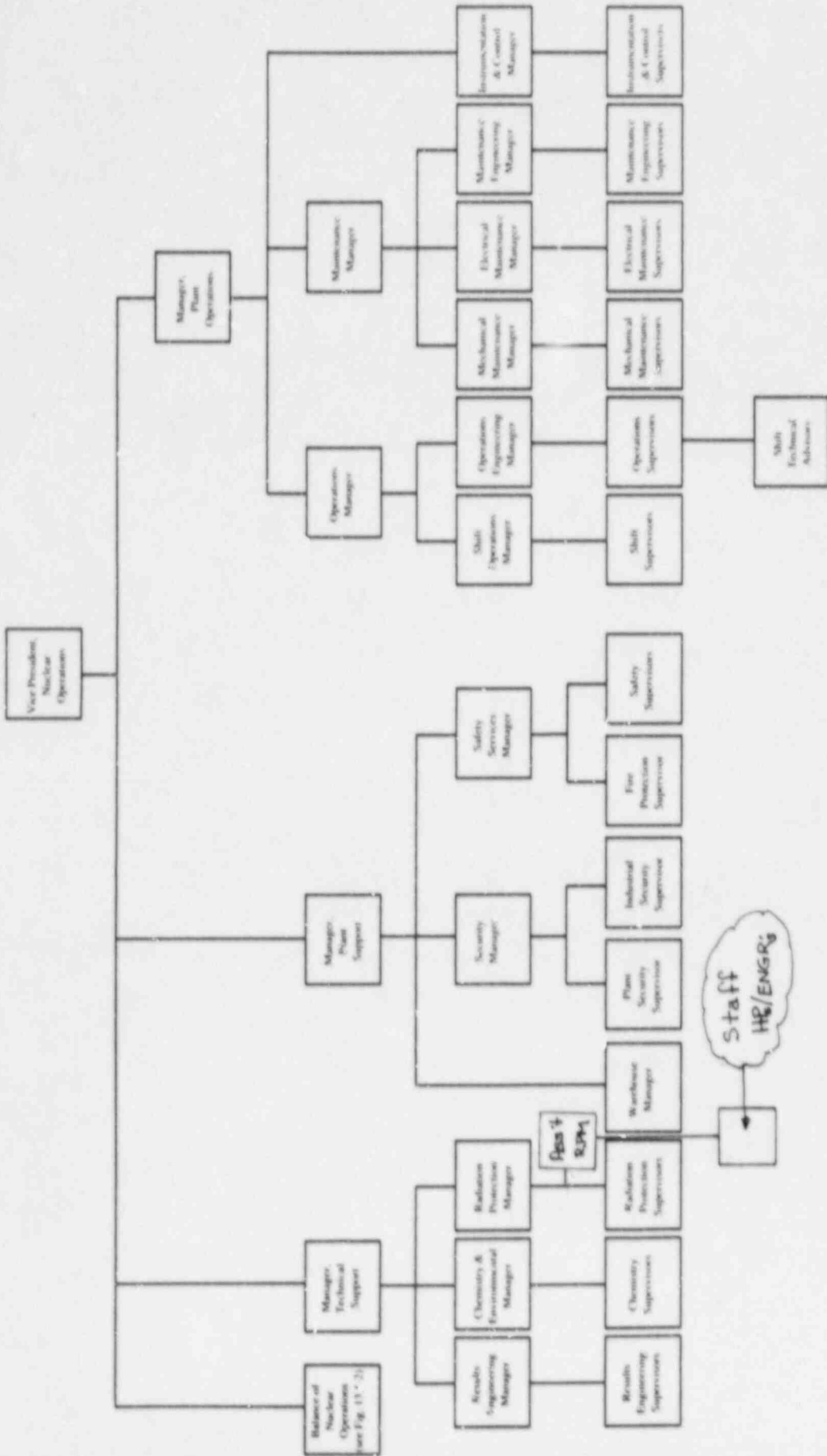
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Attachment  
Enclosure

c-Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

## ENCLOSURE 1

### Assistant Radiation Protection Manager Responsibilities

1. Supervising the radiation protection staff health physicists and engineers.
2. Developing, reviewing and approving radiation protection programs and procedures.
3. Participating on the Station Operations Review Committee (SORC) as a member.
4. Ensuring that radiation protection programs and procedures are being properly implemented.
5. Analyzing trends in radiation work performance of station personnel contamination and exposure control, and job exposures, and taking necessary actions to correct adverse trends.
6. Reviewing and approving the station radiation protection training program.
7. Directing the evaluation and disposition of problems, incident reports and quality assurance issues that relate to radiation protection to ensure appropriate action is taken to address such issues.
8. Participating on the Station ALARA Review Group (SARG) as a member addressing, evaluating and implementing, as appropriate, ALARA concerns to enhance radiation safety at CPSES.
9. Stopping work on any radiation protection related activity not being done to his/her satisfaction.
10. Communicating directly to the Manager, Plant Operations or the VP, Nuclear Operations on any unresolved or urgent radiation protection related issue.



Proposed change to  
R.P. Organization.