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January 24, 1983
NRC/TMI 83-006

Docket No. 50-320

GPU Nuclear Corporation
Mr. B. K. Kanga
Director, TMI-2
P. O.Box 480
Hometown, PA 17057

Dear Mr. Kanga:

Subject: TMI-2 Radiological Field Operations Training Program

By letter dated April 23, 1982, GPU Nuclear submitted a summary of the TMI-2 Radiological Field Operations Training Program used to train Radiological Control Foremen and Technicians. This program was submitted in accordance with proposed Technical Specification 6.3.2 as an alternative to meeting the standards of ANSI-N 18.-1971. We have reviewed your program and find it acceptable subject to the incorporation of certain experience requirements for Radiological Control Foremen and Technicians. The experience requirements are delineated in the enclosed Safety Evaluation. Per conversation with Mr. J. Hildebrand of your staff, GPU Nuclear agreed to incorporate the specified experience requirements for Radiological Control Foremen and Technicians within the training and qualification program.

The NRC on-site staff will continue to review the implementation of the TMI-2 Radiological Field Operations Training Program to assure that the recommendations of the NRC Special Panel (NUREG-0640), and the TMI-2 management plan commitments continue to be incorporated in the training program.

Original signed by
Lake H. Barrett

Lake H. Barrett
Deputy Program Director
TMI Program Office

Enclosure: As Stated

cc: J. Barton
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DATE	1/20/83	1/20/83	1/24/83			

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

THREE MILE ISLAND UNIT NO. 2

RADIOLOGICAL FIELD OPERATIONS TRAINING PROGRAM

Introduction

Section 6.3.2 of the proposed Technical Specifications for TMI-2 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-2 Radiation Controls Training Program". In accordance with this specification, GPU Nuclear, the licensee, on April 23, 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 one 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 April 23, 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 specified 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 a 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: January 24, 1983

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