



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND ATOMIC ENERGY COMMISSION

Rhode Island Nuclear Science Center

16 Reactor Road

Narragansett, RI 02882-1165

18 April 2013

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Mr. Xiaosong Yin

Subject Qualifications of the Assistant Director for Radiation and Reactor Safety at the Rhode Island Nuclear Science Center

Dear Mr. Yin:

It has been brought to our attention that a question has been raised about the qualifications of the individual that is currently the Assistant Director for Radiation and Reactor Safety at the Rhode Island Nuclear Science Center (RINSC), who serves as the facility RSO. The individual that is currently in the position has a Master's Degree in Physics, rather than specifically in Health Physics. Additionally, the individual has taken rigorous health physics courses designed specifically for individuals that are going to serve as an organizational RSO. Consequently, we believe that this person has the equivalent combination of education and experience to meet this qualification. As I understand it, there are three options for rectifying this issue:

- 1) Hire a new individual that has a Master Degree level education specifically in the Health Physics field,
- 2) Have the current individual earn a Master Degree level education specifically in the Health Physics field, or
- 3) Request a license amendment to relax the qualification in the RINSC Technical Specifications, to make it more in line with ANSI 15.4, Selection and Training of Personnel for Research Reactors.

The purpose of this letter is to formally request a change to RINSC Technical Specification 6.2.2 which describes the qualifications of the Radiation Safety Officer. The current specification states that:

"The Radiation Safety Officer shall have a master's degree in health physics or radiological health and three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed."

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The proposed specification is:

“The Radiation Safety Officer shall have a master’s degree in health physics or radiological health and three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed, or any equivalent combination of education and experience.”

This proposed wording makes the Technical Specification requirement similar to the wording that the State of Rhode Island uses to describe the qualifications of the individual in this position. ANSI Standard 15.1-2007, The Development of Technical Specifications for Research Reactors, section 6.1.4 indicates that the selection of personnel should follow the guidance of ANSI Standard 15.4 Selection and Training of Personnel for Research Reactors. Section 4.3 of this standard describes the qualifications of Level 2 facility management as having:

“...a minimum of six years of nuclear experience. The individual shall have a recognized baccalaureate or higher degree in an engineering or scientific field.” The degree may fulfill up to four years of nuclear experience required.”

Consequently, the proposed specification is more conservative than what ANSI 15.4 requires for this position in the organization.

As we do not want this apparent discrepancy to impact current operations, we would ask that this matter be considered as quickly as possible.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Davis", with a stylized, flowing script.

Michael J. Davis
Assistant Director for Operations

Enc.: RINSC Technical Specification Page 44 Amendment 29

RINSC Technical Specification Page 44 Proposed Amendment

RI State Job Description for the Assistant Director for Radiation and Reactor Safety

Current RINSC Technical Specifications (Amendment 29):

TECHNICAL SPECIFICATIONS Rhode Island Nuclear Science Center Docket 50-193, License R-95

4. In accordance with the emergency plan, a list of emergency personnel, management and offsite agencies is posted in the control room.

6.2 Qualifications of Personnel

1. At the time of appointment to the position, the Director shall have a minimum of six years of nuclear experience. The Director shall have an advanced degree in one of the physical sciences or engineering. The degree will fulfill four years of the six-year requirement.
2. The Radiation Safety Officer shall have a master's degree in health physics or radiological health and three years of applied health physics experience in a program with radiation safety problems similar to those in the program to be managed.
3. The reactor operators and senior operators shall be licensed in accordance with the provisions of 10CFR55.
4. In the event of temporary vacancy in the position of Director or the Radiation Safety Officer, the functions of that position shall be assumed by qualified alternates appointed by the RIAEC.

6.3 Responsibilities of Personnel

1. Director

- a. The Director shall have responsibility for all activities in the reactor facility which may affect reactor operations or involve radiation hazards, including controlling the admission of personnel to the building.

This responsibility shall encompass administrative control of all experiments

being performed in the facility including those of outside agencies.

- b. It shall be the responsibility of the Director to insure that all proposed experiments, design modifications, or changes in operating and emergency procedures are performed in accordance with the license. Where uncertainty exists, the Director shall refer the decision to the NRSC.

2. Senior Reactor Operators

Proposed RINSC Technical Specification (Amendment 31)

TECHNICAL SPECIFICATIONS Rhode Island Nuclear Science Center Docket 50-193, License R-95

4. In accordance with the emergency plan, a list of emergency personnel, management and offsite agencies is posted in the control room.

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3. The reactor operators and senior operators shall be licensed in accordance with the provisions of 10CFR55.
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- b. It shall be the responsibility of the Director to insure that all proposed experiments, design modifications, or changes in operating and emergency procedures are performed in accordance with the license. Where uncertainty exists, the Director shall refer the decision to the NRSC.

RI State Job Description for the Assistant Director for Radiation and Reactor Safety

CLASS TITLE: ASSISTANT DIRECTOR FOR RADIATION AND REACTOR SAFETY

Class Code: 02505500

Pay Grade: 39A

EO: A

CLASS DEFINITION:

GENERAL STATEMENT OF DUTIES: To be responsible for radiation and reactor safety at the Rhode Island Nuclear Science Center (RINSC) and radiation safety at the University of Rhode Island (URI) to include both ionizing and non-ionizing forms of radiation with responsibility for planning, organizing and maintaining an effective radiation protection program; and to do related work as required.

SUPERVISION RECEIVED: Works under the technical and administrative supervision of the Director, Rhode Island Nuclear Science Center and the URI Radiation Safety Committee with considerable latitude for the exercise of independent judgement in the application of accepted methods, procedures, and techniques of health physics; work is reviewed by the Nuclear and Radiation Safety Committee (RINSC) and the Radiation Safety Committee (URI) for evaluation of such methods, procedures and techniques.

SUPERVISION EXERCISED: Plans, supervises and reviews the work of professional, technical and clerical personnel assigned to assist in performance of assignments.

ILLUSTRATIVE EXAMPLES OF WORK PERFORMED:

To be responsible for radiation and reactor safety at the Rhode Island Nuclear Science Center (RINSC) and radiation safety at the University of Rhode Island (URI) to include both ionizing and non-ionizing forms of radiation with responsibility for planning, organizing, and maintaining an effective radiation protection program.

To plan, organize and maintain a program of facility monitoring, environmental monitoring and personnel exposure monitoring and maintain required records to ensure the safety of individuals and to ensure compliance with Federal and State Licensing conditions and applicable safety and environmental laws.

To exercise authority to halt radiological operations, when necessary, for health and safety reasons.

To serve as member of the RINSC and URI radiation safety committees.

To do related work as required.

REQUIRED QUALIFICATIONS FOR APPOINTMENT:

KNOWLEDGES, SKILLS AND CAPACITIES: A thorough knowledge of the principles, practices and techniques of the field of health physics especially as it relates to the programs at RINSC and URI; a thorough knowledge of Federal and State regulations and licensing procedures; the ability to plan, supervise and review the work of technical assistants and others engaged in health physics matters; the ability to demonstrate computer proficiency in the use of programs associated with radiation assessment; the ability to prepare scientific, technical, and other reports containing findings, conclusions, and recommendations relating to health physics problems and techniques; and related capacities and abilities.

EDUCATION AND EXPERIENCE:

Education: Such as may have been gained through: graduation from a college of recognized standing with a Master's Degree in the field of Health Physics; and

Experience: Such as may have been gained through: employment in a responsible technical position with responsibility for professional and technical oversight within a comprehensive radiation protection program, preferably at a nuclear reactor facility.

Or, any combination of education and experience that shall be substantially equivalent to the above education and experience.

Class Created: July 4, 1999

Editorial Review: 3/15/03