

Docket

OCT 11 1977

Docket Nos. 50-269
50-270
and 50-287

Duke Power Company
ATTN: Mr. William O. Parker, Jr.
Vice President
Steam Production
Post Office Box 2178
422 South Church Street
Charlotte, North Carolina 28242

Gentlemen:

By letter dated March 9, 1977, we requested that you determine if the individual performing the function of Radiation Protection Manager (RPM) at the Oconee Nuclear Station, meets the minimum qualifications of Regulatory Guide 1.89, September, 1975. We further stated that if the RPM is so qualified, you should propose a technical specification which states that the RPM shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. On the other hand, if the present incumbent does not meet the minimum requirements of the guide, we requested that you advise us of this fact and provide a written commitment that the successor to the incumbent will be so qualified and that you will propose a technical specification to that effect at the time a successor enters that position.

By letter dated May 13, 1977, you responded to our request by taking exception to the provisions of Regulatory Guide (R.G.) 1.8. Your principal objections were that the RPM should not be required to have a bachelor's degree and an additional 5 years experience.

This letter is to advise you that R.G. 1.8 does not require the RPM to have a bachelor's degree. Rather, the Guide says that he shall have a bachelor's degree or the equivalent in a science or engineering subject. To provide clarification of this point, our definition of "equivalent" in the context of R.G. 1.8, is as follows:

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- (a) 4 years of formal schooling in science or engineering,
- (b) 4 years of applied radiation protection experience at a nuclear facility,
- (c) 4 years of operational or technical experience/training in nuclear power, or
- (d) any combination of the above totaling 4 years.

It should be noted that the above requirement is in addition to the requirement for five years of professional experience in applied radiation protection as specified in the Guide.

It is our position that the ANSI 18.1-1971 standard does not provide the appropriate qualifications required for the onsite RPM whose responsibility is to manage a radiation program with an annual man-rem budget such as that at Oconee, and, that the requirements of R.G. 1.8 are necessary for the RPM at the station to assure that exposures from normal operations, maintenance, etc., are maintained at levels that are as low as is reasonably achievable.

Accordingly, we reiterate our request that you adopt the provisions of R.G. 1.8 for any replacement of the current RPM in accordance with our letter dated March 9, 1977. Please respond within 45 days of receipt of this letter.

Sincerely,

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A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

cc: See next page

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Duke Power Company

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October 11, 1977

cc: Mr. William L. Porter
Duke Power Company
P. O. Box 2178
422 South Church Street
Charlotte, North Carolina 28242

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