

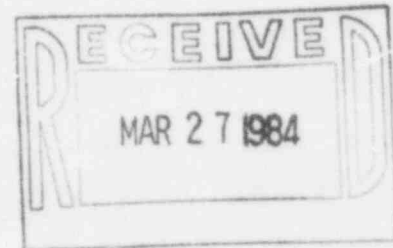


DMB
KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

March 23, 1984

Mr. J.E. Gagliardo, Acting Chief
Reactor Project Branch 2
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 84-043

Re: Docket No. STN 50-482

Ref: 1) Letter dated 2/8/84 from JEGagliardo,
NRC, to GLKoester, KG&E
2) Letter KMLNRC 83-158 dated 11/30/83
from GLKoester, KG&E, to JEGagliardo, NRC
3) Inspection Report STN 50-432/83-20 dated
10/31/83 from JEGagliardo, NRC, to
GLKoester, KG&E

Subj: Response to NRC Questions Concerning Health
Physics Experience Requirements

Dear Mr. Gagliardo:

Attached are Kansas Gas and Electric Company's responses
to the questions transmitted in Reference 1).

Please contact me or Mr. Otto Maynard of my staff if you
have any further questions concerning this matter.

Yours very truly,

Glenn L. Koester

GLK:bb
Attach

cc: WSchum

8404260293 840419
PDR ADOCK 05000482
Q PDR

TEOL

QUESTION 1: "How you intend to satisfy the recommendations of American National Standard ANSI/ANS 3.1-1978 concerning the assurance that technicians (in this case radiation protection technicians) possess the necessary practical experience and skills that will allow them to make sound decisions concerning the health and safety of plant personnel and the public during plant operation (including outage conditions)".

Response 1: Those KG&E technicians who have less than three years of actual working experience at an operating nuclear power plant will have participated in Health Physics activities at operating nuclear power plants during two outage conditions. This provides intensive practical experience and develops the skills necessary to allow them to make sound decisions concerning the health and safety of plant personnel and the public during plant operation. In order to maximize the benefit of this outage participation, the Site Health Physicist typically contacts the Radiation Protection Manager of the host facility to discuss the types of experience desired, and to ask that the WCGS Technicians be assigned to the most beneficial jobs in terms of providing the desired experience and training. As a follow-up, the WCGS Health Physics Technicians prepare a report describing the training and experience gained during their stay at the host facility. A copy of this report is sent to the host Radiation Protection Manager for verification and endorsement.

The planned intensive practical experience and skills gained during participation in two outages at operating nuclear power plants is at least equivalent to the practical experience and skills which would be casually gained by a radiation protection technician working for two years at a single facility.

In addition, Health Physics Technicians working at WCGS participate in the construction phase confined space entry permit program. This program provides actual experience in evaluating potentially hazardous conditions (oxygen deficient atmospheres and toxic chemicals and gases) and in making decisions concerning the health and safety of plant personnel. Most WCGS Health Physics Technicians will have had at least two years working experience in this area at the time of fuel loading.

QUESTION 2: "How your radiation protection technician training program for personnel with little or no previous experience satisfies the recommendations of ANSI/ANS-3.1-1978, Section 4.5.2, regarding 3 years of working experience in their speciality of which only 1 year should be related technical training. Your position, as stated in the response, indicates that you will accept 2 to 3 months related experience as satisfying the ANSI standard recommendations."

Response 2: ANSI/ANS-3.1-1978, Section 4.5.2 states in part that, "Technicians shall have three years of working experience in their speciality of which one year should be related technical training". The word "only" is not used in the standard. "Experience" is defined by the Standard as "Applicable work in design, construction, preoperational and startup testing activities, operation, miantenance, or technical services....". The Health Physics Technicians who will be considered qualified by KG&E at fuel loading will have had more than three years working experience in their specialty, including training and work experience both at Wolf Creek and operating plants. KG&E's program is designed to assure that WCGS Health Physics Technicians have obtained meaningful experience before being considered qualified. As described in the response to QUESTION 1, technicians with less than three years of actual experience at an operating nuclear power plant are required to participate in Health Physics activities at operating nuclear power plants during two outages. In addition, most WCGS Health Physics Technicians will have had at least two years working experience during the design, construction, and startup phases at Wolf Creek. Work experience at Wolf Creek includes activities such as the confined space entry permit program described above, as well as active involvement in the Health Physics program and procedures development.

In order to further enhance KG&E's technician experience base during the initial operating phase at Wolf Creek, KG&E will maintain a minimum of seven Health Physics Technicians who have at least two years experience at an operating nuclear power plant. These seven technicians will be available for in-plant duties. This enhanced experience base will be maintained for a minimum of one year after fuel load to allow time for the other KG&E technicians to gain additional operating experience. In the event that the number of technicians with two years operating experience falls below seven during this year, KG&E will immediately initiate actions to retain individuals with the required qualifications and restore the enhanced experience base back to seven.