



State of Louisiana
Department of Environmental Quality

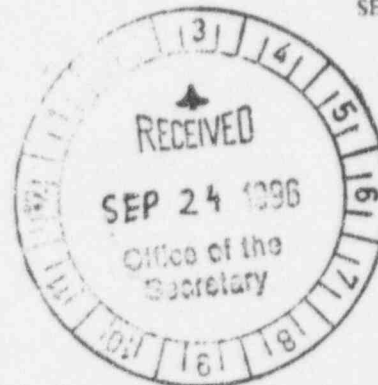
M.J. "MIKE" FOSTER, JR.
GOVERNOR

September 6, 1996

J. DALE GIVENS
SECRETARY

OSI-4

**The Honorable Shirley Ann Jackson, Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001**



Dear Chairman Jackson:

For some time now, states have been awaiting a final decision on the NRC's proposal to discontinue financial support of state training. It is very difficult for state radiation control programs to plan future activities without knowing if additional resources will be required for training.

Recently, comments from New Mexico and Illinois have come across my desk which are appropriate for NRC to consider. However, I should like to add one or two items regarding NRC support for training of state personnel. These ideas are my own and don't necessarily reflect my department's position, and some of them you've probably heard before.

First of all, Agreement States are a creation of the federal government; yet, the federal government allows the NRC to provide very little in the way of financial support. If it were not for Agreement States, the NRC would have to bear the burden of the whole "agreement materials pie," not just a third of it (my estimate). The cost to the NRC would be considerably more if states were not involved. The NRC should devote much more effort toward achieving 100% Agreement States in the shortest possible time and not be content with just 60%!

To achieve Agreement State status attests to the fact that there is an adequately trained staff to have an effective radiation protection program. Training has to come from some source, and if the states are left to find training wherever it exists, we lose the uniformity which we've had in the past. There are quite a few organizations around the country which are equipped to offer adequate training, but the cost to the states can vary from minimal to monumental. NRC training, on the other hand, is provided at no profit to the agency, which should cost less. And, let's not forget that NRC requires trained employees in order to retain Agreement State status. Thus, the NRC should continue to take the lead to ensure that adequate training is provided (at little or no cost to states).

If all states had the same resources, the result of NRC's removing its support would not be as variable as I foresee. We should all be in a position to tackle the problem in similar fashion and maintain a certain level of competence. However, because of the great variability in state resources, it is my opinion that one of the adverse effects of discontinuing training programs at no cost to the states is that some states (and, perhaps, the NRC?) will seek to entice trained personnel away from states who have such personnel, thereby increasing the load on states losing those personnel.

9/13...To EDO for Appropriate Action...Cpy to: Chairman, RF...96-0979

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any comment on I.I. Keyser and others

The Honorable Shirley Ann Jackson
September 6, 1976
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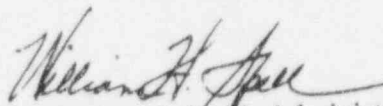
Most program directors acknowledge that states are a fertile training ground for industry to seek trained employees, frequently offering no less than a 25% increase in salary and benefits, often more. That is a problem shared by most states, and as a result, we are in a mode of continuous training as we are forced to add new employees. The need for training is compounded by the fact that not many educational institutions are turning out sufficient numbers of persons trained in basic radiation safety, and those who are usually are offered higher-paying jobs in industry.

There seems to be a very close link between training, performance, and compatibility. If the decision is made to discontinue or severely curtail the present support for training, I feel that NRC needs also to curtail its insistence that every state program have the level of training presently expected within a specified period of time or else be non-compatible. A finding of either "non-compatibility" or "not adequate to protect the public health and safety" places a burden on a program which may not always be justified, and it requires resources which could otherwise be put to good use in protecting human health and the environment. Such findings are counter-productive to a radiation control program's mission.

In summary, to maintain a competent radiation protection program staff requires adequate salaries and training which is readily available, and most of all, affordable. Having adequate salaries is mostly a state problem, and we work on this continually. But if the NRC desires to assist states short of providing funding, it can be done by easing the financial burden on states to maintain sufficient numbers of trained personnel. Most other states seem also to be in the mode of "downsizing," "re-baselining," "belt-tightening," or whatever one wants to call it, along with the NRC. In over-simplified terms, it all boils down to "doing more with less." Reducing the financial burden would assist the states in these efforts. However, the benefits to NRC also seem to extend to non-Agreement States when you consider that all state staffs are generally available more quickly in an emergency than NRC's regional staffs and are generally offered at no cost to the NRC when needed. If they are well-trained in all aspects, it will benefit everyone and especially when non-Agreement States are ready to assume Agreement State status.

Thank you for taking the time to read these long-overdue comments. I really had every expectation that it would not be necessary to write them. I still sincerely hope it was a waste of time.

Very truly yours,


William H. Spell, Administrator
Radiation Protection Division

Enclosure

c: NRC, Office of State Programs
Organization of Agreement States