The Honorable John T. Conway  
Chairman  
Defense Nuclear Facilities Safety Board  
625 Indiana Ave., N.W.  
Washington, D.C. 20004

Dear Chairman Conway:

In the implementation plan for the Defense Nuclear Facilities Safety Board Recommendation 91-6, the Department of Energy committed that the core training for general employees, radiological workers, and radiological control technicians be accomplished by December 31, 1994. For the great majority of Environmental Management contractors operating defense nuclear facilities, this commitment was fulfilled on time. The remaining contractors' employees who needed to be trained, mainly at Rocky Flats, finished this training during the first three quarters of 1995.

In June 1995, the Mound Plant was transferred from Defense Programs to Environmental Management. At that time, the percentage of completed core training was low (only 26 percent training for radiological workers). Under Ohio Field Office guidance, EG&G Mound hired a new subcontractor for training workers and undertook an intensive program of training. At this moment, all general employees and radiological workers who needed training have completed it. The present status of training for Mound's radiological control technicians is as follows: 58 percent are fully trained and 27 percent are in advanced stage of training, with completion expected by December 31, 1995. The remaining 15 percent of technicians (back from extended medical leave or working part time) are in various stages of training, and completion is planned for the end of the first quarter of 1996. For those radiological control technicians that will not be fully trained by the end of 1995, the nature of work and the needed supervision will be tailored depending on their training stage.

The Office of Environmental Management anticipates that by the end of December 1995, all contractor employees performing work for the defense nuclear facilities that need the four core courses in radiological training will be fully trained.

In their documented Radiation Protection Plans for 10 CFR 835 submitted in January 1995 all Environmental Management defense nuclear facility sites reported compliance or presented plans to be in compliance with 10 CFR 835 by January 1, 1996. 10 CFR 835, Subpart J requires that radiological workers and control technicians must be trained commensurate with their assignment, or be accompanied by and under the direct supervision of a trained worker. Violations of 10 CFR 835 can be subject to civil and
criminal penalties. This provides adequate worker protection during training of new hires and for correction of any discovered deficiencies. For this reason, Environmental Management does not believe that any further reports on the status of radiological control training pursuant to Board Recommendation 91-6 are needed for its defense nuclear facilities.

For any questions, please contact Dr. Maria Gavrilas-Guinn, the Radiological Control Program Advisor for Environmental Management at 202-586-2232.

Sincerely,

Richard J. Guimond
Assistant Surgeon General, USPHS
Principal Deputy Assistant Secretary for Environmental Management

cc:
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