

Proposed Revision of Manual Chapter 1246
Comments from the Regions
and Disposition of those Comments

Region I

1. Comment: The DWM staff are not inspectors and recommend that such references be removed. See page X-1 in Qualification Journal, second paragraph, last sentence, Qualification card 6 on page X-6 should refer to *Inspection Accompaniments* in A, not *Inspections Completed*.

Response: (1) Qualification Journal, page X-1, second paragraph, last sentence - words *inspectors, license reviewers* deleted. (2) Qualification card 6 on page X-6 - Word *Completed* replaced by the word *Accompaniments*.

2. Comment: Qualifications Card 9, the Fundamentals of Inspection course, G-101, should be included as required training.

Response: Although this course continues to be listed as a training course, there are no sessions scheduled or planned. Therefore, this course will not be included as required training. First line supervisors are free to add the course as "Specialized Training" if and when the course is offered.

3. Comment: The document is incomplete in that there are missing sections identified as FILL IN. See Qualification Guide 2 and Page 3 in Attachment 2 as example.

Response: Qualification Guide 2 - The words *FILL IN* are replaced by a specific area of review, *Subpart A*.

4. Comment: Qualification Guides 2, 3, 4, 5, and 7 have phrases such as general, working knowledge, understanding, that are underlined. There is no need to underline these and the underlines should be removed.

Response: Qualification Guides 2, 3, 4, 5, and 7 have been revised to delete the specified underlining.

Region II

1. Comment: Qualification Card 9, the Fundamentals of Inspection course, G-101, should be included as required training.

Response: Please see response to Region I, Comment 2.

2. Comment: Qualification Guide 6, the number of inspection accompaniments should be increased from one to three. This would provide more of an opportunity for observing different interactions in different situations.

Response: The benefit gained for the qualifying employee from an inspection is a function of both the scope of the inspection activities and the interaction the qualifying employee has with the inspector. Therefore, the supervisor should have the flexibility to decide if one inspection is adequate or if more inspections are necessary. No change was made to Qualification Guide 6.

3. Comment: Qualification Guide 8, consideration should be given to providing some standard on accomplishing the task of reviewing casework. This could include a specific number of cases reviewed or a specific number of hours expended reviewing cases.

Response: The proposed format of Qualification Guide 8 specifically gives the supervisor the flexibility to decide the standard and areas of review. The supervisor makes this decision based on the qualifying employee's background. This flexibility allows the supervisor to better use their assigned human resources. For example the effort and time a qualifying employee needs in this area is a function of the experience that employee brings to the new position. A recent college graduate will need more training in this area than a new employee with either industry or NRC experience. Also, the format of Qualification Guide 8 allows the supervisor flexibility to assign current licensing casework for review. No change was made to Qualification Guide 8.

Region III

1. Comment: Qualification Guides 2, 3, 4, 5, and 7 should be restructured to provide greater supervisor discretion and flexibility in outlining the training needs of their employees by incorporating *Core* and *Supplemental* sub-sections.

Response: Qualification Guides 2, 3, 4, 5, and 7 as proposed focuses the review to specific areas determined to provide a baseline understanding for the position of either decommissioning technical reviewer or project manager. Thus, these qualification guides as proposed represent the core areas for qualification. However, a supervisor is always allowed and encouraged to supplement qualification training requirements for those employees deemed to need additional training. In addition, this proposed revision provides the supervisor greater discretion in determining the level of understanding the qualifying individual must obtain. No change was made to Qualification Guides 2, 3, 4, 5, and 7.

Region IV

1. Comment: Revised Section X, page X-1, Paragraph B.1.b - It seems that NRC & It's Environment, Regulatory Process, and Public Outreach should be core required training. Additionally, the Fundamentals of Inspection course (G-101) should remain a required core course.

Response: NRC & It's Environment, Regulatory Process, and Public Outreach training would provide relevant information for qualifying individuals, but not specifically necessary for individuals to function as either decommissioning technical reviewers or project managers. With respect to the Fundamentals of Inspection course (G-101) please see the response to Region I comment number 2. No changes were made to Section X.

2. Comment: OSHA training should be added to supplemental course list and this training should include aspects of the OSHA Indoctrination course (G-111) plus the NRC/OSHA MOU and chemical safety. No changes were made to Section X.

Response: While this training would provide relevant information for qualifying individuals, it's not needed for individuals to function as either decommissioning technical reviewers or project managers. The information obtained from this type of training is more suited qualifying inspectors.

3. Comment: Qualification Guide 5, page X-19 - The following manual chapters (MC) should be included: MC 0330, *Guidance For NRC Review of Licensee Draft Documents*, MC 0620, *Inspection Documents and Records*, MC1007, *Interfacing Activities Between Regional Offices Of NRC and OSHA*, MC 1201, *Conduct of Employees*, MC 2602, *Decommissioning Inspection Program For Fuel Cycle Facilities and Materials Licensees*, and MC 2605, *Decommissioning Procedures For Fuel Cycle and Materials Licensees*.

Response: MC 0330, MC 0620, and MC 1007 provide useful information but not vital for individuals to perform as either decommissioning technical reviewers or project managers. MC 1201 is already listed in Qualification Guide 5. MC 2602 and MC 2605 will be added to Qualification Guide 5. Further, based on a re-review of Qualification Guide 5 MC 0300, MC 0610, MC 1246, MC 3500, MC 6500, MC 8300, and MC 8400 are being removed based on the criteria that while these documents provided useful information, they are not necessary for an individual to function as either a decommissioning technical reviewer or project manager.

4. Comment: Attachment B, It seems that a section is missing that should include the Inspection Program and the Enforcement Policy.

Response: Attachment B of the April 19, 2001, memorandum provided examples of where we felt that the current training requirements for either decommissioning technical reviewers or project managers were excessive. Attachment B is not part MC 1246, and therefore, no change to the proposed MC is necessary.