

November 9, 2001

MEMORANDUM TO: Michael R. Johnson, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Eugene V. Imbro, Acting Chief */RA/*
Operational Experience and Non-Power Reactors Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

SUBJECT: COMMENTS AND QUESTIONS ON REVISION TO INSPECTION
MANUAL CHAPTER 1245

Attached are comments and questions on the proposed revision to the inspector qualification program. We look forward to continuing to work with you on developing this program. Should you have any questions, please contact Marvin Mendonca of my staff.

Attachment: As stated

CONTACT: Marvin M. Mendonca
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301-415-1128
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COMMENTS AND QUESTIONS ON THE REVISION TO INSPECTION MANUAL CHAPTER 1245

General Comment

- Many of these program elements could be used for training of all NRC employees. We suggest that managers be made aware of the program, which they may want to use as a starting point to establish training programs for their employees.
- The revisions seem oriented primarily to regional inspectors. Consideration should be given to the fact that some headquarters inspectors or personnel would be using this manual chapter, appendices, and associate guidance. Some examples of this were noted in these comments, but a review should be done to assure comprehensive consideration of this point.

Manual Chapter 1245

- The definition “attitude” seems to be for tangible, observable attributes that are appropriate to characterize inspection performance. However, the use of the word “attitude” does not clearly convey this performance-based characteristic. Therefore, we suggest reconsideration of the term “attitude.” We also suggest that similar appropriate reconsideration for KSAs also be made.
- Under “Responsibilities and Authorities,” a position for the Associate Director for Training and Development “[a]dministers and implements the formal training programs for NRR ...” To avoid potential confusion of organization structure we suggest you delete “for NRR” and/or add “, HR” after the title.
- Under “Responsibilities and Authorities,” should the Director of NRR have responsibilities for headquarters staff similar to Regional Administrator for regional staff?
- Under “Responsibilities and Authorities,” section 04.05 states “Chief, Inspection Program Branch. Develops and maintains, in conjunction with the Associate Director for Training and Development and the regions...” We suggest adding “and the appropriate headquarters staff” after “regions” to include functions in headquarters, e.g., non-power reactors. Another example of this is under “Board Recommendations,” where it states “Any areas where additional review was required (look-up items) must be completed by the individual and verified by an assigned member of the board before forwarding the recommendation to the regional administrator.” We suggest adding “or Office Director” at the end of the sentence.
- “Board Conduct,” says “[t]he board should require no more than about 2 hours to complete its assessment.” To give latitude to the boards we suggest adding: “However, the Board’s assessment may take more or less time depending on candidates responses, and the information the Board feels it needs for their assessment.”
- Under “Board Recommendation” item 2 we suggest adding: “The Board and the individual’s supervisor will agree on a schedule for reexamination.” This will ensure that a reasonable period has been established.

- Under “Changing Inspector Classification,” the need for a Qualification Board should be specifically established.

ATTACHMENT 1, “General Overview of the Inspector Training and Qualification Program”

- We suggest a reorganization of the writeup to match the flow chart. Specifically, provide separate headings for Entry Level, Personal and Interpersonal Skills, General Proficiency, Technical Proficiency, Qualification Board, Advance Level Training and Qualifications.
- In the first paragraph, the use of both the terms “regulatory processes” and “regulatory practices” seems redundant. We suggest you either clarify the difference, delete one of these terms or combine them into regulatory processes and practices. Preferably, we suggest the use of inspector competencies from ATTACHMENT 2, “Inspector Competencies” to replace the “four general areas” in this paragraph.
- In the third paragraph, the phrase “general ROP framework” should be changed to “general ROP and inspection program framework” to allow for non-power reactor inspection program and possible other program development such as construction, pre-op, etc.

ATTACHMENT 2, “Inspector Competencies”

- Under “Qualification Board,” we suggest “appreciation” and “attitude” be changed to more demonstrable terms related to understanding and capabilities. Preferably we suggest paraphrasing with the Entry Level Qual Journal, Introduction statements that “A competent inspector must....”
- Under “Personal and Interpersonal Effectiveness.” it says “[i]s not afraid to admit not having the answer.” We suggest adding “and is aware of where to get an answer or assistance.”
- Correct typos, e.g., “hte,” “supproted,” and “interactionswith.”

ATTACHMENT 3, “General Orientation Topics”

- The list has an indication of management directives for certain topics. A general statement could be made that for other or additional information Human Resources representatives or the supervisor should be contacted.
- The list refers to “Regional Library Services.” We suggest changing to “Regional and/or Headquarters Library Services” to provide a potential understanding of all NRC library functions and to be applicable to headquarters personnel.

“Entry Level Qual Journal”

- “Regional Seminar on Expectations for Inspectors (8 hours)” is specified training. We suggest you delete “Regional” as some seminars may be done in or for Headquarters. Similar comment for the signature card.
- Under “Interpersonal Skills,” conflict resolution training is not included, yet one of the attributes is to resolve conflicts? We suggest consideration of an appropriate place for that training if not already in other parts of the qualification process.
- The “Inspector Objectivity, Protocol, and Professional Conduct” section questions “[w]hat are the overall requirements used by NRC managers to verify the performance and objectivity of individual inspectors and team leaders during on-site activities at power reactor facilities?” We suggest you delete the word “power” to be applicable to all reactor inspectors.
- The “Entry Level Training and Qualification Journal,” refers to “Exploring Reactor Oversight Programs (ROP) Internal Webpage.” We suggest you also make this information for non-power reactor inspectors.
- Appendix C lists “D.2, Operator Licensing Examiner Training and Qualification Program.” Non-power reactor examiners need to be included in the development of this program.