## February 11, 2003

MEMORANDUM TO: A. Randolph Blough, Director, DRP, RI

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FROM: Bruce A. Boger, Director /RA/

Division of Inspection Program Management

SUBJECT: CHANGES TO INSPECTOR TRAINING AND QUALIFICATION

**REQUIREMENTS** 

The purpose of this memorandum is two-fold. The first is to thank you for your continued support of the Inspection Manual Chapter (IMC) 1245 Task Group. The effectiveness of this group is a reflection of your commitment to maintaining the quality of our inspection staff. In addition to the technical representatives from each region, we were also very fortunate to have had the regional training coordinators from three regions. The perspectives they provided were key to a full understanding of the issues being discussed in this memorandum.

The second is to inform you of two immediate actions I am authorizing as a result of recommendations made by the IMC 1245 Task Group.

The first action is related to inspector re-qualification cycles. During the February 4th and 5th meeting of the IMC 1245 Task Group, the group evaluated the proposal submitted by Region II to incorporate a 3- to 6-month "grace" period to the 3-year re-qualification requirement for inspectors. The underlying need for that change was the fact that the re-qualification clock is being reset when the inspector completes the required refresher courses. This has meant that an inspector must complete the required courses as close to the end of their qualification cycle or to have the cycle length reduced.

The IMC 1245 Task Group recommended that the re-qualification cycle be a full 36-month period and that the inspector be able to complete the required training at any time during that period. The group recognized that in some cases it may be more than three years between subsequent refresher courses, but felt that normal supervisory oversight and the existing requirement for supervisors to observe inspectors in the field would identify any instances when immediate refresher training may be needed. The group also identified circumstances where work demands may require an inspector to delay training beyond the 36-month period. In those instances, the deviation process in IMC 1245 can be used to obtain approval to exceed the 36-months.

The regional training coordinators, who participated in the group meeting, identified that the current record-keeping systems would need to be modified to accommodate this change. To the extent that you can within the limits of your record-keeping system, I authorize you to immediately implement inspector re-qualification using a full 36-month cycle. Each individual re-qualification cycle will be calculated based on the month of initial qualification or, if that is not known, the month in which the current cycle was begun. A conforming change on this matter will be incorporated into the next revision of IMC 1245.

The second action is related to Safeguards Inspector Qualification requirements. The group discussed that the unavailability of required training courses is delaying the initial qualification of safeguards inspectors. Effective immediately, the Advanced Physical Security Course and the Defense Industrial Security Course are no longer required for initial qualification of Safeguards Inspectors. In lieu of the supervisor's signature, a reference to the ADAMS accession number of this memorandum should be noted on the Proficiency Level Signature Card and Certification contained in Appendix C4 of IMC 1245. A conforming change will be incorporated into the next revision of IMC 1245.

If you have any questions about these changes or IMC 1245 in general, contact Mary Ann Ashley at 301-415-1073 of the Inspection Program Branch or e-mail her at MAB@NRC.gov.

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