Feedback Summary
for
Manual Chapter 1245, Inspector Training and Qualification

NOTE: Typographical and numbering errors corrected throughout all parts of document and not listed here.

Procedure Section	FEEDBACK	RESOLUTION
Responsibilities and authorities	Chapter does not acknowledge NSIR.	Added Director, NSIR as responsible for content of Appendix C4.
	Need to have more structured schedule for the Expectations Seminar	Added responsibility to the Division Directors for ensuring scheduling for course in accordance with schedule.
	More information needed on responsibilities for deviations	Program office branch chiefs given responsibility for approving deviations, immediate supervisors given responsibility for requesting deviations from the program office.
Maintaining Qualification	We should give ourselves some "grace period" to complete refresher training. If refresher training is required once every 3 years, there should be a grace period of 1 or 2 quarters. (3 to 6 months)	Change made to section 05.04, Maintaining Qualification. Change allows the inspector to complete the training at any time during the refresher period but keeps the base month and year for determining refresher period end date.
Deviations	Need more information on what really requires a deviation.	Section 05.07, Deviations, created. Specifically states that deviations are needed for taking courses out of sequence and for extending the refresher period.
Attachment 1 - Program description, Content, and Sequencing	Add a conditional clause that would allow and individual to progress to the next level if every thing else is complete and they are just waiting for a course to be offered.	No change made
	People should be able to take proficiency level courses without finishing the entry level without needing a deviation.	Courses in all journals have been reviewed and some have been identified as not having any prerequisites and therefore can be taken at any time. See the appendix C journals

	Not clear where an inspector learns about the inspection program or writing reports.	No change needed. ROP and Reports covered in ISA-9, Exploring the Operating Reactor Inspection Program; ISA-20, Documenting Inspection Findings; OJT-5, Documenting Inspection Findings; and in the Conducting Inspections Course
	Students take courses that they weren't ready for. The courses are sequenced and should be taken in a specific order, but this is not always happening Someone should complete the Basic Inspector Certification before starting the General Proficiency courses. To avoid duplication, the Expectations for Inspectors Seminar, Conducting Inspections, and Field Techniques and Regulatory Practices courses were designed to build on each other.	Where applicable, course listings have been sequenced in the order in which they should be taken. Specific directions have been added instructing trainees to ensure that they have met prerequisites.
	The B and C journals should be worked in parallel	The B and C journals are designed to be worked in parallel. Flow chart in Attachment 1modified to emphasize this fact.
Vendor inspector	Move D4 - Vendor Inspector Qualification Journal to a C appendix so that it is a basic qualification rather than an advanced qual.	Change made
Construction inspector	Add C9 - Construction Inspector to the list as a place keeper.	Change made

Appendix A: Basic-level	FEEDBACK	RESOLUTION
Course titles	IMC 1245 is inconsistent when it comes to using the correct course titles.	All course titles have been formatted and contain a course reference number when applicable.
Requirements	Need to say more about the timing of the "Expectations" seminar	Wording added to the journal specifically stating that the "Expectations Seminar" should be taken after completing the majority of the work in the journal.
Description	Add some ideas about what is meant by "close but not direct" supervision	Wording changed to conform to the NRC Manual 4130 terms related to "trainees". Wording also changed in MC.
Signature and Certification sheets	provide more specific direction about what to do with the signature and certification sheet	Additional direction added to each form
ISA-5 Allegations	Add information concerning the Commission's policy for a "Safety conscious work environment and an employee's right to raise safety concerns with the following references and have evaluation criteria and tasks related to them.: 61 FR 24336, May 14, 1996 60 FR 7592 February 8, 1995 54 FR 3424 January 24, 1989 NUREG 1499	No changes made since the issue of safety conscious work environment is still being reviewed within the agency.
ISA-6 NRC's Response to an Emergency at a Nuclear Facility	NRC emergency response plan also referenced as NUREG - 0728 Include in references NUREG/BR 0230, section Q "Concepts of Operations"	No changes needed No change made
ISA-7 The Enforcement Process	enforcement policy needs to be referenced as NUREG-1600 Delete evaluation criteria 3 - since it is a combination of 1 and 2	ISA revised

ISA-8 The Office of Investigations	No Office of Investigations web site available Reference to MC-0019 should be MD 9.8	ISA revised
ISA-10 Exploring Reactor Oversight Program's (ROP) Internal Webpage	ISA #10 needs to be updated accordingly to ROP web page task #2 no longer on web page task #3 Can't find	ISA revised
ISA-11 Augmented Inspection Team (AIT), Special Inspection Team (SIT), and Incident Inspection Team (IIT) Activities	Include MD 8.2 "NRC Incident Response Program" as part of the references	ISA revised
ISA-12 Understanding How the Commission Operates	task #3 not needed	No change needed
ISA-14 NRC Interagency Agreements	level of effort: 8 hours Reference: "NRC Rules and Regulations, Volume IV", document extremely large and not needed to answer ISA NUREG/BR-0256 very helpful Add the requirement for inspector to view the OSHA indoctrination video. Add references and reviews related to Agreement States	No change needed Reference deleted No change made Video is not a requirement No change made. **Closes feedback form MC1245-602** ISA revised
ISA-15 Interactions with the Public	level of effort: 12 hours MD 3.57 not needed Include NUREG/BR-0200 as a reference	ISA revised including changing the level of effort
ISA-16 Contacts with the Media	level of effort: 8 hours Risk Communication Seminar VuGraphs not helpful	ISA revised including removing slides and changing level of effort to 4 hours
ISA-18 Freedom of Information Act and the Privacy Act	level of effort: 8 hours	ISA revised including changing the level of effort to 6 hours

ISA-19 Entrance and Exit Meetings	MC 0620 does not deal with entrance and exit meetings	References modified
ISA-21 Differing Professional Opinions (DPO) and Differing Professional Views (DPV)	Include NUREG/BR-0161	No change made since NUREG is not available electronically.
ISA-22 Overview of 10 CFR Part 50	We are not providing sufficient guidance for some of the ISAs relating to 10 CFR	ISA revised
ISA-23 Overview of 10 CFR Parts 19 and 20	We are not providing sufficient guidance for some of the ISAs relating to 10 CFR	ISA revised
ISA-24 Licensee-specific regulatory documents and procedures	Add Reg Guide 1.33, Quality Assurance Program Requirements. This will help the inspector to establish the link between Tech Specs and licensee procedures.	Reference added

Appendix B: General Proficiency Training and Qualification Journal	FEEDBACK	RESOLUTION
Training courses	Move the Root Cause and Media Workshop to the "take it anytime" group within Appendix B	Media Workshop moved Root Cause was not moved because it requires technical knowledge in order to fully participate in the case studies
	Need more for inspectors on corrective action programs	The ISA on corrective action programs in the Operations (C1) journal was moved to Appendix B and made applicable to all inspectors.

Appendix C1: Operations Inspector	FEEDBACK	RESOLUTION
Refresher training	If an inspector is qualified in multiple vendors, is refresher training required every three years for each vendor?	Clarified in the requirements section. "If you are qualified in more than one reactor type, <u>either</u> the BWR or PWR refresher training shall be completed every three years. Inspectors should alternated between PWR and BWR technologies."
ISA OPS-1	Need a reference describing the rule-making process in plain English to help with Evaluation Criteria 4.	ISA revised Task moved to ISA-2 in Appendix A. Location of rule-making page on external web site noted.
ISA-OPS-2	Modify task 3 to ready "...TRM or licensee amendment changes to individual tech specs" (not everyone has a TRM.)	ISA revised
ISA-OPS-3	Eliminate GL 90-05 - no longer needed since a change to 10 CFR 50.55a Task 5 should be modified to meet with a "senior" inspector to discuss operability evaluations.	No change made. GL remains a valid description of the issues. No change made Supervisor should identify those who can sign off on journal.
ISA-OPS-4	NOEDs are not longer handled by OE in the region - they are handled by DRP - change task 3 to meet with the appropriate DRP person.	ISA revised
ISA-OPS-6	Make this ISA on corrective action programs applicable to all inspectors Add to task 3 - "Discuss common variations of CAPs between licensees (threshold, screening, oversight groups, etc) Clarify what was meant by "hierarchy of QA requirements	ISA moved to Appendix B and made applicable to all inspector. ISAs in C1 renumbered to reflect the change. Changes made
ISA-OPS-7	OMA standard should be added	ISA revised

OJT-OPS-1	Add to evaluation criteria 6 "Discuss how to convey discrepancies and anomalies to the licensee for resolution"	No change made. This is already covered in Appendix A in OJT-4.
OJT-OPS-2	Add item to discuss minimizing interference in the control room while inspecting and especially during an event	No change made. This is already covered in Appendix A in OJT-2.
Form 1	Add a copy of Form 1 should go to the supervisor	Form revised
Required Courses	Make P-111 required for the operations inspectors	No change made

Appendix C2: Engineering Inspector	FEEDBACK	RESOLUTION
Refresher training	C2 requires engineering inspectors to complete the reactor refresher class once every three years. However, some inspector who qualified under previous versions of 1245 did not have to take the full reactor series - so the refresher would be meaningless for them. What should the refresher requirements be for this group? Also, the refresher requirements are confusing - do they need to take the system refresher and the simulator and the EOP section every three years	A note was added to the Required Refresher Training section identifying the appropriate courses to take for those qualified under the previous version of IMC-1245. Closes Feedback form MC1245-488
ISA-ENG-4	References are hard to find and maybe unnecessary. Particularly the older ANSI standards ANSI N3.1, 3.2, 45.2-12, 42.2.13, 45.2.23, AND 45.4	References in ISA-ENG-4 revised to incorporate more up to date information. **Closes feedback form MC1245-535**
Required Courses	P-111 should not be a required course for engineering inspectors	P-111 moved to the category of post qualification training. Need for attendance to be determined by supervisor.

Appendix C3: HP Inspector	FEEDBACK	RESOLUTION
Introduction	add a conditional statement allowing specific portions of the program to be taken concurrent with the Basic with supervisor approval	Required courses reviewed and 3 identified as NOT requiring the completion of Appendix A. However, course prerequisites must still be met by trainees.
Required courses	Add the following courses to the list - H-105 In-place Filter Testing - H-111 Environmental monitoring for Radioactivity - H-119 Radioactive Materials - H-311 Respiratory Protection - H-312 Whole Body Counting	H-111, H-311, H-312 are already required by the program. H-105 and H-119 were determined by the program office as not necessary for initial qualification.
ISA-HP-4	Add in references and study goals for addressing IP 71121.02 (02.07 Declared pregnant workers) References NUREG/CR 5631 and NCRP 128 - Radionuclide Exposure of Embryo/Fetus Add focus areas about when and how licensee limit, monitor and track declared pregnant workers and the embryo/fetus exposure and any other considerations about pregnant workers	ISA revised.

ISA-HP-5	Add the following references concerning SCBA and respiratory protection 64 FR 54543 - respiratory protection and controls to restrict internal exposure	ISA revised
	Also add evaluation criteria to address testing, maintenance and replacement cycles for the various SCBA air cylinders and the air quality necessary to maintain compliance with NRC regulations and where, when and how air quality is tested.	No change made per program office
	Add the following ANSI standard references concerning testing and calibration of portable instruments ANSI N42.17A-1989 ANSI N42.17B-1989 ANSI N42.17C-1989 ANSI N323A-1997	No change needed. References are already in the list of references at the back of ISA-HP-5. See page APP C3-35
ISA-HP-8	Delete evaluation criteria 8 and task number 8 because they refer to outdated PC-DOSE code	ISA revised
ISA-HP-9	Add the following to reference 4 as e. Davis-Besse Special Inspection Reports 02-06 and 02-16, ADAMS Accession #ML030070606 and add the following as reference 5 Davis-Besse Special Inspection Reports 02-06 and 02-16, ADAMS Accession #ML030070606	ISA revised
OJT-HP-1	Add the following reference to the list Davis-Besse Special Inspection Reports 02-06 and 02-16, ADAMS Accession #ML030070606	OJT revised
OJT-HP-6	Delete evaluation criteria 12 and task 7 related to PC-DOSE code	OJT revised Level of Effort increased from 45 to 90 hours per program office

Appendix C4: Safeguards Inspector	FEEDBACK	RESOLUTION
Required courses	courses not readily available and delay qualification	Removed courses from the required list.
Remainder of C4 being evaluated by NSIR and will be issued separately.		

Appendix C6: Emergency Planning Inspector	FEEDBACK	RESOLUTION
On-the-job Training Section	Correct the numbering error that skips OJT 5 and make conforming changes to Form 1 and the signature card and certification	OJT revised
ISA-EP-7	Change wording for Evaluation Criteria 1, 2, 3, and 4	All changes made
ISA-EP-8	Change the wording of Evaluation Criteria 1 and 2.	All changes made
ISA-EP-10	For Task 1: Change to read: Receive hands-on instruction on how to operate the NRC dose assessment model (RASCAL).	Change made
ISA-EP-12	Update/change references to IMC 0610, Appendix B to IMC 0612 and the applicable portions.'	Change made
OJT-EP-9	Delete the requirement to have performed OJT-EP-7 prior to performing this OJT.	Change made

Appendix C7: Decommissioning Inspector	FEEDBACK	RESOLUTION
Entire appendix	Delete appendix - Strategic area has been transferred to NMSS.	Proposal being evaluated by NMSS

Appendix C7 - Decommissioning Inspector	FEEDBACK	RESOLUTION
Appendix being deleted because program responsibility assigned to NMSS.		

Appendix C10: Examiner Training	FEEDBACK	RESOLUTION
Contents	The requirement for an additional Chief Examiner training course has been eliminated.	The Team Leader training program was never developed.
Throughout	Put examiner qualification on par with inspectors.	Appendix D2 changed to Appendix C10.
Contents	C10 needs to be consistent with other C Appendices.	Sequence and headings edited.
Contents	The Team Leader training program was never developed.	The requirement for an additional Chief Examiner training course has been eliminated.
Contents	C10 needs to have a Form 1 to conform with other C Appendices.	Form 1 added.
Introduction	Unique nature of examiner work does not require all Appendix A to be completed before working on C	Basic-Level ISAs have been identified for examiners so that they can begin the Proficiency-Level before completing Basic training.
Introduction / Training Courses	To clarify expectations; some courses are not applicable to the examiners' job.	Interpersonal skills courses must be completed, but Appendix B courses may be deferred until inspector qualification.
Introduction	Regional question since 1245 issued and to conform with other C Appendices.	The DRS equivalency discussion has been relocated and edited to include examples and require the use of Form 1.
Training Courses	To conform with other C Appendices.	The courses have been listed and a prerequisite note added.
Refresher Training	To conform with other C Appendices and stand alone.	This discussion has been relocated to the front of the Appendix and edited to delete the reference to Appendix C1.

ISA Introduction	To correct an error in Appendix D2.	The treatment of activities that overlap with C1 has been clarified.
ISA-1	To conform with the new NRC website.	The OL web references have been updated.
ISA-4	To conform with new information.	The RIS and SECY references have been updated.
ISAs-9, 10, and 11	To make Appendix C10 a stand-alone document.	These activities have been incorporated from Appendix C1.
ISA-12	For ease of reference.	An ML number has been provided for Manual Chapter 500.
ISA-15	To implement the simulator rule change.	The references have been updated.
OJT-2	To make Appendix C10 a stand-alone document.	This activity has been incorporated from Appendix C1.
OJT-4	To conform with anticipated NUREG-1021, Revision 9 changes.	Task 1 has been clarified to require preparation of an RO and SRO written examination.
CE Signature Card	The Team Leader training program was never developed.	The Team Leader training course has been eliminated.
Form 1	To conform with other C Appendices.	The form identifies those examiner courses, ISAs, and OJTs for which the Director, DRS can make equivalency rulings.

Appendix D1 - Senior Reactor Analysis	FEEDBACK	RESOLUTION
Content being reviewed. Changes to be issued at a later date.		