

May 5, 2003

MEMORANDUM FOR: All Technical Reviewers of a High-Level Waste Repository License

FROM: Janet Schlueter, Chief *IRA*
High-Level Waste Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: QUALIFYING TECHNICAL REVIEWERS

The Department of Energy is expected to submit a license application for a geologic repository at Yucca Mountain in December 2004. The Division of Waste Management plans to qualify the majority of high-level waste (HLW) repository license technical reviewers before the license application is submitted.

This memorandum describes the basic qualification of technical reviewers, outlines the responsibilities of the staff and supervisors for qualification, and discusses the criteria for grandfathering staff and interim qualification.

Qualification Requirements

Manual Chapter 1246 defines minimum training and qualification requirements for HLW repository license technical reviewers. The requirements include initial qualification through self-study, formal classroom, and on-the-job training; and additional training to maintain and enhance the effectiveness of the qualification. The objective is to ensure that all technical reviewers meet minimum knowledge and qualification standards.

Consistent with the intent of Manual Chapter 1246, all qualification requirements and activities should be related to the assigned area or tasks. The requirements should be flexible, considerate of division and individual needs, and be an effective and efficient use of available resources. Attachment 1 is the standard qualification journal from Manual Chapter 1246 for HLW repository license technical reviewers. The supervisor and qualifying staff should individualize his/her own qualification journal as described below. To assist you in determining your qualification, a copy of your training record, dated September 2002, is attached for your use (Attachment 2). You should also review your training record to ensure that it is complete and accurate. Any discrepancies should be brought to the attention of Ms Eileen Schultz, NMSS's Technical Training Coordinator to correct your training record. DWM relies on the accuracy of the Human Resources records for all HLW license reviewers.

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Upon completion of the qualification requirements identified in the qualification journal, an oral qualification board (Board) will evaluate the qualifying staff's understanding of the material. The board will assess the qualifications of the staff to determine whether the individual should be certified as a qualified HLW license technical reviewer.

Qualification Journals

The qualification journal is the key planning document for the individual qualification. The qualification journal should be utilized to plan, guide, and document the qualification process. The content of the qualification journal should be based on communication and coordination between the qualifying staff and the supervisor. The supervisor and staff will develop an individualized qualification journal and obtain the Branch Chief's approval.

In developing the individualized qualification journal, the focus should be on utilizing the most effective and efficient methods available for the staff to attain the necessary skills and competencies. It is intended that the development of the qualification activities be a constructive and interactive process between the staff and their supervisors. The individual qualification methods and training needs will be selected based on the individual's education, training, and experience relative to the skill set necessary for successful performance of the assigned responsibilities.

The qualification journal should be precise in identifying specific training requirements, including technical and skills courses, project assignments, rotational assignments, and special independent projects. Qualification journals should be concise, and have the following structure: (1) cover sheet with overall signature/date lines; (2) descriptions of regulatory activities and training courses with individual signature/date lines; (3) descriptions of technical activities and training courses with individual signature/date lines; and (4) if needed, an appropriate notation, description, or documentation of an oral board with individual signature/date lines. A sample customized qualification journal is included as Attachment 3.

Oral Qualification Board

The Board assesses the qualifications of the individual to conduct the HLW repository license technical review. Questions should focus on those situations that require the reviewer to demonstrate a knowledge of NRC policy and philosophy, as they relate to the licensee and the implementation of the HLW repository regulatory program.

Grandfather and Interim Qualification

Staff with significant education, training, and applicable experience (at least 5 years), may be grandfathered, and thus documented as fully qualified. Qualification requirements can only be waived on the basis of a well-supported justification. This justification must be documented. Grandfather and waiver actions are initiated by the staff or supervisor and must be approved by the Branch Chief. A sample grandfather memo is included as Attachment 4.

Interim qualification may be granted to personnel to independently perform technical review based on review of the individual's existing skills, competencies, knowledge and professionalism. Interim qualification should be considered only in situations where the vast majority of the training requirements have been satisfied, but full qualification cannot be completed due to extenuating circumstances (i.e., a training course required for qualification has not been scheduled). Interim qualification justification must be documented and should be approved by the Branch Chief.

Responsibilities

1. Supervisors have the responsibility to ensure that (a) prior to assigning work, staff have either completed full or interim qualification activities and documentation or received appropriate supervision and mentoring to perform the work; and (b) sufficient time and resources are available for the staff to complete qualification on schedule.
2. Supervisors have the responsibility to guide the staff qualification process, develop the qualification journal with the staff, and obtain the Branch Chief's approval for completion.
3. Each staff member has the responsibility to (a) ensure that progress towards completion of the qualification activities is maintained and documented and (b) provide periodic status reports to their supervisor; (c) notify the supervisor when the qualification plan may need revision or obstacles arise that may affect completion of qualification on schedule; and (d) provide a copy of all relevant qualification documentation to Mr. Kien Chang of my staff.

Documentation and Records

Qualification will not be complete until the paperwork is complete. The individual qualification journal will be signed off as activities are completed and verified. Upon completion of all required qualification activities, including the successful completion of the oral board, a qualification certification memo is prepared that states that the candidate has completed the qualification. The memo will be signed by the Branch Chief, effective the date of successfully completing the oral board. Attachment 5 is a sample qualification certification memo.

Qualification may be documented with a qualification certification memo, a qualification grandfather memo, or an interim qualification memo. These memoranda will be the records that the staff has completed the full or interim qualification and will be retained as part of the official training record in NRC's Agency Documents Access and Management System.

Attachments:

1. Qualification Journal from MC 1246
2. Individual Training Record
3. Sample Customized Qualification Journal
4. Sample Grandfather Memo
5. Sample Qualification Certification Memo

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