April 28, 1995

MEMORANDUM TO: Michael J. Bell, Chief
Engineering and Geosciences Branch

John H. Austin, Chief
Performance Assessment and Hydrology Branch

FROM: Joseph J. Holonich, Chief
High-Level Waste and Uranium Recovery
Projects Branch

SUBJECT: PROPOSED INSPECTOR QUALIFICATION PROGRAM FOR DIVISION OF WASTE MANAGEMENT

The purpose of this memorandum is to inform you of the proposed inspector qualification program for the Division of Waste Management (DWM). Attachment 1 is an information paper describing the current guidelines and requirements set forth in NRC Manual Chapter (MC) 1245, and revised draft MC 1246 to certify NRC personnel as inspector qualified. This attachment also provides a summary of the overall proposed concept for DWM inspector qualification, which was formulated from discussions conducted with cognizant NRC staff responsible for overseeing inspector qualification programs within other divisions, and at the Technical Training Center.

Based on the above information, a draft plan to implement an inspector qualification program for DWM is provided as Attachment 2. In order to conserve resources in the technical branches, the proposed approach is to qualify staff from the High-Level Waste and Uranium Recovery Projects Branch as inspectors. For uranium recovery activities, approximately three Project Managers from the Uranium Recovery Projects Section would be qualified. In the high-level waste area, the two Quality Assurance staff along with the On-Site Representatives and the Yucca Mountain Project Manager from the High-Level Waste and Quality Assurance Section would be qualified. These qualified staff would then serve as team leaders for inspections conducted solely by headquarters staff.

Please review the proposed plan and provide any comments by May 12, 1995. I will present this plan to the Director, DWM following receipt of any input.

Attachments: As stated
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INFORMATION PAPER ON NRC/DWM INSPECTOR QUALIFICATION PROGRAM REQUIREMENTS

1. General

The purpose of this information paper is to provide a synopsis of training guidelines and requirements outlined in NRC Manual Chapter (MC) 1245, and revised draft MC 1246 to certify NRC personnel as inspector qualified. Additionally, this paper describes the proposed plan for developing a DWM training program to qualify staff as inspectors. Only those individuals who have successfully completed the required training outlined in the applicable NRC MCs, and further expounded upon in this paper, will be authorized to perform independent inspections.

2. Inspector Qualification Process

The inspector qualification process consists of a combination of formal classroom instruction, self-study, and on-the-job training (OJT). This process encompasses regulatory, administrative, and technical practices pertinent to each specific area of inspection. After completing the aforementioned training, which is documented in a personal Qualification Journal maintained by the supervisor, the inspector-designee will undergo a comprehensive oral qualification board. Upon fulfillment of all formal course-work and self-study requirements, OJT, written tests, and oral boards, the inspector-designee is considered fully qualified.

3. Post Qualification Training

In addition to becoming initially certified as an inspector, there are post qualification training requirements that each inspector must complete in order to remain current. This includes applicable supplemental training courses (contingent on individual's background and experience) and refresher training (performed every three years).

4. Interim Inspector Qualifications

If management evaluates the background and performance of an inspector-designee and concludes that he has demonstrated an ability to perform inspections in specific areas even though all required training has not been completed, the Regional Administrator, Office Director, or designee as appropriate can authorize the individual to perform inspections in those areas. This does not preclude completion of the formal qualification process, which should be completed within the specified time limits - or as soon as possible.

5. Exceptions to Policy

The Regional Administrator or Office Director has the authority to waive any requirement listed for an inspector in MCs 1245 and 1246. Justification for the waiver must be documented and entered into the inspector's training file. Additionally inspectors, who through prior experience, education, or training

possess sufficient knowledge to meet minimum requirements, may validate a course(s) through satisfactory completion of an equivalency examination.

6. Concept of Proposed DWM Inspector Qualification Program

DWM is responsible for developing and implementing its own formal 'in-house' training program to qualify inspectors. In order to meet the requirements described above, the High-Level Waste and Quality Assurance Projects Section and the Uranium Recovery Projects Section of HLUR will each designate several Project Managers (PMs) to complete the inspector qualification program described in Attachment 2. Once qualified, these individuals will accompany technical staff on any site inspection being conducted independent of Region IV. The PM's role will be to lead the conduct of the inspection, to include site entrance and exit briefings, and serve as NRC's official point of contact with all licensees. Technical staff will provide 'technical assistance' during the site inspections.

Attachment 2 outlines a 'generic' training program which meets the requirements set forth in MCs 1245 and 1246, and will be used to qualify HLUR staff as inspectors. The training program will consist of requirements for initially qualifying staff members as inspectors, as well as provide guidance for conducting supplemental and refresher training in order for inspectors to maintain their current qualification status. To become initially qualified, a staff member must complete a series of informal OJT/self-study requirements, formal core training courses (offered by TTC), and specialized training requirements specific to the High-Level Waste or Uranium Recovery Programs, respectively. Completion of these training requirements will be documented and maintained by the supervisor in a personal Training and Qualification Journal.

Upon completion of the aforementioned training requirements, the staff member will undergo an oral qualification board. The board will convene for the purpose of reviewing the staff member's completed training records and for determining, by process of an oral examination, that the inspector meets the minimum knowledge and qualification standards specified in MCs 1245 and 1246. An acceptable decision by the board will result in a favorable recommendation to the Regional Administrator or Office Director. Concurrence by the Regional Administrator or Office Director, as the certifying official, will be documented and a record kept in the inspector's training file. This process documents NRC certification that the inspector is qualified to independently conduct inspections.

The minimum number of personnel required to constitute a board is three. A cross-section of qualified personnel should be included, and can range from a peer level inspector to a Division Director. Management of at least the Branch Chief level should be included on each board, in addition to the inspector's immediate supervisor.

DWM will develop a list of review questions that include all areas of the Training and Qualification Journal. Major emphasis in questioning should be directed toward those situations that require the inspector to demonstrate a knowledge of NRC policy and philosophy as it relates to the licensee and the

implementation of the inspection program. Questions of technical nature should not be the focus of the oral examination since this should have been already tested during formal coursework - and considering that the inspector will be accompanied by DWM staff performing technical assistance during the site inspections.

TTC is currently drafting a revised MC 1246, which outlines the general core qualification requirements for NMSS inspectors (similar in scope and content to MC 1245). However, DWM will need to develop the specific training requirements to supplement the general core courses that are offered by TTC in order to have a complete inspector qualification program. These specific training requirements will be documented in the inspector's Training and Qualification Journal.

DRAFT PLAN FOR DEVELOPING DWM INSPECTOR QUALIFICATION PROGRAM

1. Purpose

   The purpose of this plan is to develop an 'in-house' training program that can be used to qualify DWM staff to conduct independent on-site inspections.

2. Discussion

   The following training program is a 'generic' shell which serves as a general guideline for qualifying DWM staff as inspectors (excluding the oral examination board). This plan enumerates the training courses/ requirements that will be documented and maintained by the inspector's supervisor in a separate personal Training and Qualification Journal.

3. Training

   a. Required Initial Training - This training is required for initial qualification of DWM inspectors.

      1) OJT/Self-Study Training - This training is conducted at NRC HQs through OJT and self-study, using the appropriate DWM Training and Qualification Journal.

         - NRC Orientation
         - Code of Federal Regulations
         - Office Instructions
         - Regulatory Guidance
         - NRC Inspection Manual
         - Industry Codes and Standards
         - Inspection Accompaniments
         - NRC Management Directives
         - Ethical, Legal, and Financial Aspects of Licensee's Facility

      2) Core Training Courses - This training is provided in formal classroom or workshop environments and is conducted by NRC staff or contractors.

         - Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108)
         - OSHA Indoctrination Course (G-111)
         - Root Cause/Incident Investigation Workshop (G-205)
         - Inspecting for Performance (G-304)
         - NMSS Radiation Worker Training (H-102) or Site Access Training (H-100)
         - Effective Communications for NRC Inspectors (OP)

3) Specialized Training - This training pertains to specific aspects of the High-Level Waste and Uranium Recovery Programs.

i.) High-Level Waste Program

- o TBD

ii.) Uranium Recovery Program

- o UR Program Policy and Guidance Directives
- o Inspection Reports
- o Reclamation Plans
- o RAPs, PIDs, TERs, CRs, etc.
- o License Conditions
- o Licensee Operations Plan
- o License Application
- o Other

b. Supplemental Training Courses - Additional training beyond that identified as Core Training. This training will be determined by the inspector's supervisor and will depend on the individual's previous work experience and planned inspection or licensing activities in specific areas.

c. Refresher Training - Refresher training will be conducted every three years following initial qualification and will consist of the following:

- Fundamentals of Inspection Refresher Course (G-102)
- Other