

Re: Interest in FP manual action training

Julio, I've provided my comments in response to the individual questions below. My comments are in bold.

- Ron

>>> Lois James 05/06/04 09:18AM >>>

There have been some questions raised here at HQ regarding the FP manual action rule, the current IP, and training. From what I have been able to research, acceptable manual actions used to require an exemption from NRR. Under the new rule and the current IP, the inspectors make the determination of manual action acceptability. Being the inspectors who now make the determination, what are your thoughts? Here are mine.

NRR

Questions:

1. Was training provided to the inspectors regarding acceptability of manual actions?

NRR

Some training was provided during the FP workshops through discussion of the topic. However, not all fire protection inspectors were able to attend the workshops.

a. If so, was it sufficient, or is more/different training necessary?

NRR

The training was sufficient for determining whether manual actions are feasible. However, we're hearing noises from NRR that we're supposed to be checking for more than that. If there's more to it, we need to be told.

b. If not, is training necessary?

NRR

Depends on what rules we are supposed to go by.

Is training required?

Based on my training coordinator tools, training should be provided because something new was added to the job - the inspectors are/will be required to make determinations on acceptability of manual actions previously made by NRR.

NRR

Reviewing manual actions is not new. Each of the regions, as a minimum, walks down manual actions to verify feasibility. The question is what are the rules that we're supposed to be using for evaluation.

However, the determination is simple and has been being used for about 12 months already. So training may be nice, but not necessary.

Most appropriate methods of training

Again, based on my training tools, the best methods of training are classroom or self study modules.

NR

Classroom - more than 25 students in multiple organizations and locations

- the content is stable, simple but it would be beneficial to have a subject matter expert available for questions

- a new skill was/is being introduced
- could be coordinated with fall counterpart (day before or after) to minimize travel expenses

Self study - more than 25 students in multiple organizations and locations with conflicting schedules

- a new skill was/is being introduced

V/H

experts

- the content is stable and simple
- could be taken at convenience of inspector
- could use a conference call after completing self study to discuss with subject matter
- no travel expenses

Conference with subject matter experts

- no travel expenses

If you're going to do training, do it classroom style, preferably with all of the regions fire protection folks together. There is considerable benefit to sharing insights between regions. Self study is close to a waste of time. Just by allowing self study as option tells inspectors it's not important.

Lois James
Reactor Operations Engineer
NRR/DIPM/IIPB
301-415-1112

CC: Chyu, Doris; Daley, Robert