

PART 52, OPERATIONAL STAFFING

PROGRAM APPLICABILITY: 2504

36302-01 INSPECTION OBJECTIVES

The objectives of this inspection are to verify that staff positions are filled (or there is a plan in place to fill them) with qualified personnel, and to verify that the qualifications of the staff are adequate for their designated assignments.

36302-02 INSPECTION REQUIREMENTS AND GUIDANCE

02.01 General Guidance. As part of the inspection of the licensee's construction programs, and as necessary during construction prior to fuel load, verify that minimum education, experience, and qualification requirements have been specified either by commitment to Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants" (RG 1.8) or by establishment of alternate requirements in the Safety Analysis Report (SAR). Company position descriptions, held by the personnel department, are an acceptable substitute to specific administrative instructions covering each of the listed positions, so long as the qualification requirements are established.

As part of the inspection of the licensee's construction programs, and as necessary during construction prior to fuel load, verify the minimum training, experience, and qualification requirements for those personnel who perform inspection, examination and testing functions as defined in American Society of Mechanical Engineers (ASME) NQA-1 or American National Standards Institute/American Society for Nondestructive Testing CP-189, "ASNT Standard for Qualification and Certification of Nondestructive Testing Personnel" (ANSI/ASNT CP-189), "Quality Assurance Requirements for Nuclear Facility Applications" (NQA-1) or by commitment to RG 1.8 or NQA-1.

02.02 Operating Organization.

- a. Verify the organizational structure and the assignment of responsibilities and authorities conform to license requirements as spelled out in the license, FSAR, and other facility licensing documents.
- b. Verify positions listed in RG 1.8 or NQA-1 are filled or that there are plans developed and in place to fill the positions with qualified personnel by fuel load.
- c. Verify a representative sample of the individuals filling the following positions satisfy the minimum qualification requirements for the position. Titles for the

positions were obtained from ANSI/ANS 3.1-1993, Selection, Qualification, and Training of Personnel for Nuclear Power plants.” If the incumbent's qualifications are described in the SAR, i.e., specified by surname and meeting qualification requirements, this inspection requirement is satisfied for that position.

1. Manager Level
 - (a) Plant Manager
 - (b) Operations Manager
 - (c) Maintenance Manager
 - (d) Engineering Support Manager

2. Middle Level Manager
 - (a) Training Manager
 - (b) Chemistry Manager
 - (c) Radiation Protection Manager
 - (d) Electrical Maintenance Manager
 - (e) Instrumentation and Control Manager
 - (f) Mechanical Maintenance Manager
 - (g) Operations
 - (h) Engineering Support

3. First Line Supervisor Level
 - (a) Operations Shift Supervisors
 - (b) Senior Operators
 - (c) Fuel Handling
 - (d) Training
 - (e) Chemistry
 - (f) Radiation Protection
 - (g) Instrumentation and Control
 - (h) Electrical Maintenance
 - (i) Mechanical Maintenance
 - (j) Engineering Support
 - (k) Preoperational Testing and Startup Test Engineer

4. Operators, Technicians, Maintenance, and Engineering Personnel
 - (a) Licensed Operators
 - (b) Nonlicensed Operators
 - (c) Supervisors (nonlicensed)
 - (d) Licensed, nonlicensed, and technical Instructors
 - (e) Chemistry and Radiochemistry Technicians
 - (f) Health Physics Technicians
 - (g) Instrumentation and Control Technicians
 - (h) Mechanical Maintenance Personnel
 - (i) Electrical Maintenance Personnel

- (j) Engineering Personnel including Shift Technical Advisor and System Engineers

02.03 Technical Support Organization. Verify the technical support organization, including the structure, functions, responsibilities, and authorities of the technical support organization, has been established to operate and maintain the plant, and conforms to license requirements as spelled out in the license, Final Safety Analysis Report (FSAR), and other facility licensing documents.

02.04 Welding and Non-Destructive Test Personnel. Verify the training and qualification requirements for welding and/or non-destructive testing personnel have been established and conform to license requirements. Training and qualification requirements for nondestructive test personnel are found in ANSI/ASNT CP-189, NQA-1, and in the ASME Boiler and Pressure Vessel Code. Welder qualifications are described in the ASME Boiler and Pressure Vessel Code.

02.05 Quality Assurance/Quality Control Staff.

- a. Verify that the quality assurance/control organization, including the structure, functions, responsibilities, and authorities, have been established and conform to the SAR, Quality Assurance Plan, and Technical Specifications.
- b. Verify a representative sample of 10% of the individuals filling the following positions satisfy the minimum qualification requirements:
 - 1. Quality Assurance/Quality Control Manager
 - 2. Quality Assurance/Quality Control Supervisor(s)
 - 3. QA Auditors
 - 4. QC Technicians
 - 5. QA/QC Inspectors

02.06 Licensee Verification. Verify that responsibilities have been assigned to assure that the minimum educational, experience, or qualification requirements will be satisfied for personnel in the job positions identified in items 02.02 through 02.05 above.

36302-03 RESOURCE ESTIMATE

For planning purposes, the direct inspection effort to complete this inspection procedure is estimated to be forty hours of on-site inspection hours, consistent with the scope of the planned regional initiative(s) to be performed.

It is expected that the actual hours required to complete the inspection may vary from the estimate. The inspection hours allocated for the inspection procedure are an estimate for budgeting purposes. The hours expended during an inspection should be tailored for the facility licensee and accurately recorded.

36302-04 REFERENCES

10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants."

Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)"

Regulatory Guide 1.114, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit."

NUREG-0711, "Human Factors Engineering Program Review Model."

NUREG-0737, "Clarification of TMI Action Plan Requirements."

NUREG-1791, "Guidance for Assessing Exemption Requests from the Nuclear Power Plant Licensed Operator Staffing Requirements Specified in 10 CFR 50.54(m)."

Policy Statement on Engineering Expertise on Shift (50 FR 43621).

ANSI/ASNT CP-189, "ASNT Standard for Qualification and Certification of Nondestructive Testing Personnel"

NQA-1, "Quality Assurance Program Requirements for Nuclear Facilities/with Addenda" - Requirement 2, Quality Assurance Program

36302-05 COMPLETION STATUS

Inspection of the minimum sample size required to transition to the ROP will constitute completion of this procedure.

END

Attachment: Revision History for IP 36302

ATTACHMENT 1

Revision History for IP36302

| Commitment Tracking Number | Issue Date | Description of Change | Training Needed | Training Completion Date | Comment Resolution Accession Number |
|----------------------------|-----------------------|---|-----------------|--------------------------|-------------------------------------|
| N/A | 08/19/08 CN 08-024 | Initial issue to support inspections of operational programs described in IMC 2504, NON-ITAAC INSPECTIONS Completed 4 year search of historical CNs and no commitments were found. | None | N/A | ML062910504 |