September 5, 2007

Adrian P. Heymer, Senior Director
New Plant Deployment
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

SUBJECT: FINAL SAFETY EVALUATION FOR TOPICAL REPORT NEI 06-13, "TEMPLATE FOR AN INDUSTRY TRAINING PROGRAM" (PROJECT NO. 689; TAC NO. MD3406)

Dear Mr. Heymer:

By letter dated October 30, 2006, the Nuclear Energy Institute (NEI) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review its proposed Template for an Industry Training Program, Revision 0.

Enclosed is the staff's safety evaluation (SE) which defines the basis for acceptance of NEI 06-13. On the basis of its review, the NRC staff finds that for combined license applications, NEI 06-13 provides an acceptable template for describing reactor operator and nonlicensed plant staff training programs.

Our acceptance applies only to material provided in NEI 06-13. We do not intend to repeat our review of the acceptable material described in the NEI 06-13. When the NEI 06-13 appears as a reference in regulatory applications, our review will ensure that the material presented applies to the specific application involved. Licensing requests that deviate from NEI 06-13 will be subject to a plant- or site-specific review in accordance with applicable review standards.

In accordance with the guidance provided on the NRC website, we request that NEI publish the accepted version of NEI 06-13 within three months of receipt of this letter. The accepted version should incorporate this letter and the enclosed SE after the title page. Typically, the accepted version would also contain historical review information, including NRC requests for additional information (RAIs) and your responses; however, that is not necessary for NEI 06-13 because RAIs were not issued. The accepted versions shall include a "-A" (designating accepted) following the report identification symbol.

If future changes to the NRC's regulatory requirements affect the acceptability of NEI 06-13, NEI will be expected to revise NEI 06-13 appropriately, or justify its continued applicability for subsequent referencing.

If you have any questions, please contact Michael Canova at (301) 415-0737, or mac6@nrc.gov.

Sincerely,

/RA/

Stephanie M. Coffin, Chief
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Project No. 689

Enclosure:
Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION
REGARDING THE NUCLEAR ENERGY INSTITUTE
TOPICAL REPORT 06-13
"TEMPLATE FOR AN INDUSTRY TRAINING PROGRAM"
REVISION 0

1.0 BACKGROUND

By letter dated October 30, 2006, the Nuclear Energy Institute (NEI) submitted Template for an Industry Training Program," Revision 0 (NEI 06-13) for Nuclear Regulatory Commission (NRC) review and approval. The topical report provides a complete generic training program description for use with combined license applications. NEI 06-13 was developed by the NEI New Plant Training Task Force, which includes representatives from the four design-centered working groups, to assist in expediting NRC review of the combined license and issuance of the combined license. NEI 06-13 is not applicable to the review and issuance of construction permits or operating licenses.

2.0 REGULATORY EVALUATION

The NRC staff verified that NEI 06-13, Revision 0 complies with the following regulations, regulatory guidance, NUREGs, and industry standards:

- 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspections and Investigations"
- 10 CFR Part 26, "Fitness For Duty Programs"
- 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities"
- 10 CFR Part 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities"
- 10 CFR Part 52, "Early Site Permits; Standard Design Certifications; and Combined Licenses for Nuclear Power Plants"
- 10 CFR Part 55, "Operators' Licenses"
- Regulatory Guide 1.8, Rev. 3, "Qualification and Training of Personnel for Nuclear Power Plants"
- Regulatory Guide 1.149, Rev. 3, "Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations"
- NUREG-0711, Rev. 2, "Human Factors Engineering Program Review Model"
- NUREG-0800, Rev. 2, Standard Review Plan, Section 13.2.1, "Reactor Operator Training"
- NUREG-0800, Rev. 2, Standard Review Plan, Section 13.2.2, "Training for Nonlicensed Plant Staff"
- NUREG-0800, Standard Review Plan, Section 18.0, "Human Factors Engineering"
- ANSI/ANS 3.1-1993, "Selection, Qualification, and Training of Personnel in Nuclear Power Plants"

ENCLOSURE

- NUREG-1021, Rev. 9, “Operator Licensing Examination Standards for Power Reactors”
- NUREG-1220, Rev. 1, “Training Review Criteria and Procedures”
- Generic Letter 86-04, “Policy Statement on Engineering Expertise on Shift,” February 1986

3.0 TECHNICAL EVALUATION

The staff’s review concentrated on the proposed training program description format, attributes and level of detail. In evaluating the adequacy of the format, attributes and level of detail, the staff followed the guidance of the Standard Review Plan (NUREG-0800), Section 13.2.1 (SRP 13.2.1), “Reactor Operator Training” and Section 13.2.2 (SRP 13.2.2), “Training for Nonlicensed Plant Staff.” SRP 13.2.1 outlines the training and requalification program guidance for licensed reactor operators and senior reactor operators. SRP 13.2.2 outlines the training and retraining program guidance for nonlicensed plant staff. SRP 13.2.1 and 13.2.2 apply to construction permit, operating license, and combined license applicants.

NEI 06-13 is organized into five areas, licensed operator training, training for positions listed in 10 CFR 50.120, general employee training, selected other training programs, and the training effectiveness evaluation program. Other training programs selected for description include fire protection, emergency plan, physical security, and station management training programs.

3.1 Licensed Operator Training

The “Licensed Operator Training” section of NEI 06-13 states that the Reactor Operator (RO) and Senior Reactor Operator (SRO) training programs will provide individuals with the knowledge, skills, and abilities needed to perform licensed operator duties. The reactor operator training program description includes a description of the 10 CFR 55.59 required licensed operator requalification program. The RO and SRO training and requalification programs will be developed, established, implemented and maintained using a systems approach to training (SAT) as defined by 10 CFR 55.4 and as endorsed by Regulatory Guide1.8 “ Qualification and Training of Personnel for Nuclear Power Plants,” ANSI/ANS-3.1-1993 "Selection, Qualification, and Training of Personnel in Nuclear Power Plants.” In accordance with 10 CFR 55.46, a simulator will be used for training licensed personnel and for the administration of operating tests.

NEI 06-13 further states that prior to initial fuel load, the number of licensed ROs and SROs will be sufficient to meet regulatory requirements, with allowances for licensing examination contingencies, and without the need for planned overtime.

A summary of the RO and SRO training programs follows:

1. The Licensed Operator Initial Training Program will prepare RO and SRO candidates for the NRC license exam. The program will be implemented in accordance with licensee developed administrative procedures.

2. Reactor Operator candidates will receive training in the topics listed in 10 CFR 55.41. RO candidates will receive plant simulator training to demonstrate understanding and the ability to perform the actions listed in 10 CFR 55.45.

3. In addition to the RO topics listed in 10 CFR 55.41, SRO candidates will receive training in the topics listed in 10 CFR 55.43. SRO candidates will receive plant simulator training to demonstrate understanding and the ability to perform the actions listed in 10 CFR 55.45.

4. Licensed Operator Requalification training will consist of regularly scheduled formal instruction, evaluation, and on-the-job training. Training material will be developed using the SAT process in accordance with licensee developed administrative procedures. All licensed operators will participate in continuing training.

5. Licensed Operator Requalification Program content, course schedules and examination schedules will comply with 10 CFR 55.59 and will include industry operating experience training. Licensed Operator Requalification training for licensed personnel will be conducted in accordance with licensee developed administrative procedures.

Based on the staff's review of the "Licensed Operator Training" section of NEI 06-13 outlined above, the staff concludes that NEI 06-13 clearly and sufficiently describes, in terms of scope and level of detail, the RO and SRO training programs to enable a reasonable assurance finding of acceptability for issuance of a combined license with verification of the RO and SRO training programs during the construction stage.

3.2 Training for Positions Listed in 10 CFR 50.120

The "Training for Positions Listed in 10 CFR 50.120" section of NEI 06-13 states that the training programs for the positions listed in 10 CFR 50.120 will be designed, developed, implemented, and maintained using the SAT process. 10 CFR 50.120 requires training and qualification of the following categories of nuclear power plant personnel:

- Non-licensed Operator
- Shift Supervisor
- Shift Technical Advisor
- Instrument and Control Technician
- Electrical Maintenance Personnel
- Mechanical Maintenance Personnel
- Radiological Protection Technician
- Chemistry Technician
- Engineering Support Personnel

Course content and duration for each 10 CFR 50.120 training program will be determined using SAT methodology and will follow licensee developed administrative procedures. The 10 CFR 50.120 training programs will be implemented and maintained no later than eighteen months prior to fuel load.

3.2.1 Non-licensed Operator (NLO)

NLOs will receive instruction on operation of plant equipment and components under normal and emergency conditions. The non-licensed operator training program will be a combination of formal instruction and on-the-job training. In-plant training will include system walk downs, which will emphasize the use of procedures, the proper operation of equipment, and safe operating practices. Areas of training will include:

- Fundamentals of mechanical and electrical components
- Operation of equipment and systems
- Operating procedures
- Surveillance requirements
- Operation of systems important to plant safety

3.2.2 Shift Supervisor

Prior to entering the training program, the shift supervisor will have been licensed as an SRO. The Shift Supervisors will receive additional training that addresses higher-level management skills and behaviors, and provides a broader perspective of plant operations. The Shift Supervisor training program will be a combination of formal instruction and on-the-job training. Initial shift supervisor training will include topics such as:

- Application of Operating Experience
- Problem-solving skills
- Planning and managing evolutions
- Maintaining a broad view of plant operations
- Application of observation skills
- Operating philosophy
- Shift team management
- Application of design bases to plant operations
- Emergency Plan
- Transient and Accident Analysis
- Systems Approach to Training
- Work controls

3.2.3 Shift Technical Advisor (STA)

STAs provide engineering expertise to the on-shift crew. Training provides the STA with the skills and knowledge to monitor equipment and system operation to assess plant conditions during abnormal, off-normal, and emergency events. The STA training program will be a combination of formal instruction and on-the-job training. STA initial training will include instruction in the following areas:

- Responses to accidents and analyses of plant transients
- Application of engineering principles to protection of the core
- Mitigation of plant accidents

- Basis of plant and systems design
- Reactor theory, thermodynamics, heat transfer, and fluid flow
- General Operating Procedures, Abnormal and Emergency Operating Procedures, Technical Specifications, and Administrative Controls
- Operational transient and accident analysis
- Accident response training
- Simulator training, including exercises in at least the following situations:

    - Plant or reactor startups to include a range such that reactivity feedback from nuclear heat addition is noticeable and heatup rate is established
    - Plant shutdown from greater than 50 percent power
    - Manual control of feedwater during startup or shutdown
    - Significant (10 percent or greater) power changes, in the power range, using controls as defined in 10 CFR 55.4

3.2.4 Instrument and Control (I&C) Technician

Initial training for I&C technicians will be a combination of formal instruction and on-the-job training. Training for I&C technicians will include instruction in the following areas:

- Fundamentals of instrumentation and control
- Pneumatic systems and equipment
- Electronics
- Fundamental systems training
- Instrument and Control and other job-related procedures
- Surveillance requirements
- Mitigating core damage training commensurate with their responsibilities during accidents that involve severe core damage

On-the-job training will permit I&C technicians to practice the skills and knowledge learned in the classroom.

3.2.5 Electrical Maintenance Personnel (electricians)

Initial training for electricians will be a combination of formal instruction and on-the-job training. Training for electricians will include instruction in the following areas:

- Print reading
- Use of electrical tools and test equipment
- Fundamental systems training
- Electrical components and equipment

- Electrical maintenance practices
- Maintenance procedures

On-the-job training will permit electricians to practice the skills and knowledge learned in the classroom.

3.2.6 Mechanical Maintenance Personnel (mechanics)

Initial training for mechanics will be a combination of formal instruction and on-the-job training. Training for mechanics will include instruction in the following areas:

- Print reading
- Use of hand tools, power tools, and measuring devices
- Fundamental systems training
- Mechanical components and equipment
- Mechanical maintenance practices
- Maintenance procedures

On-the-job training will permit mechanics to practice the skills and knowledge learned in the classroom.

3.2.7 Radiological Protection (RP) Technician

Initial training for RP technicians will be a combination of formal instruction and on-the-job training. Training for RP technicians will include instruction in the following areas:

- Principles of radiation
- Radiation protection and safety
- Use of survey instruments
- Use of analytical equipment
- Radiation Protection procedures
- Emergency Plan procedures
- ALARA practices and procedures
- Fundamental systems training
- Mitigating core damage training

On-the-job training will permit RP technicians opportunities to operate radiation protection equipment and practice the skills and knowledge learned in the classroom.

3.2.8 Chemistry Technician

Initial training for chemistry technicians will be a combination of formal instruction and on-the-job training. Training for chemistry technicians will include instruction in the following areas:

- Chemistry procedures
- Laboratory practices

- Conduct of analytical tests
- Operation of laboratory equipment
- Fundamental systems training
- On-the-job training to include actual operation of analytical equipment and the use of procedures
- Mitigating core damage training commensurate with their responsibilities during accidents that involve severe core damage
- Power plant chemistry

On-the-job training will permit chemistry technicians opportunities to operate analytical equipment and practice the skills and knowledge learned in the classroom.

3.2.9 Engineering Support Personnel

Engineering support personnel complete orientation training on the various aspects of nuclear technology in an operating plant environment. Initial training for engineering support personnel will be a combination of formal instruction and on-the-job training. Training for engineering support personnel will include instruction in the following areas:

- Records management and document control
- Applicable industrial and nuclear regulations, codes, and standards
- Procedures and drawings
- Applicable programs such as corrective action, configuration management, work control, and the Quality Assurance program
- Technical Specifications
- Fundamentals such as reactor theory, heat transfer, fluid flow, properties of materials, and chemistry
- Plant systems, instrumentation, and components
- Plant operations
- Introductory review of accidents
- Design processes

On-the-job training will permit engineering support personnel opportunities to practice the skills and knowledge learned in the classroom.

3.2.10 Continuing Training for Personnel Listed in 10 CFR 50.120

Personnel in positions listed in 10 CFR 50.120 will receive continuing training to maintain qualifications and enhance proficiency. Continuing training reinforces initial training by reiterating selected portions of the material. Continuing training also addresses new and modified procedures and plant design changes.

Operating Experience (OE) is included in continuing training for all programs. OE training provides personnel with actual examples of good practices and lessons learned. OE topics will be selected from Licensee Event Reports, corrective action databases, industry groups, and other sources.

Continuing training programs will be developed in accordance with SAT principles and will be conducted in accordance with licensee developed administrative procedures.

Shift Technical Advisors (STAs) will maintain their qualifications by participating in licensed operator requalification training.

Based on the staff's review of the "Training for Positions Listed in 10 CFR 50.120" section of NEI 06-13 outlined above, the staff concludes that NEI 06-13 clearly and sufficiently describes, in terms of scope and level of detail, the training programs for positions listed in 10 CFR 50.120 to enable a reasonable assurance finding of acceptability for issuance of a combined license with verification of the programs during the construction stage.

3.3 General Employee Training

The "General Employee Training" (GET) section of NEI 06-13 states that GET consists of three components, Plant Access Training, Radiation Worker Training, and General Employee Requalification Training.

3.3.1 Plant Access Training

Prior to being granted unescorted access to the plant, members of the station staff, contractor workers, and unescorted visitors will complete Plant Access Training. Plant Access Training will include the following topics:

- Station organization
- Station facilities and layout
- Station administration
- Nuclear plant overview
- Industrial safety
- Fire protection
- Quality assurance and quality control
- Plant security
- Emergency planning
- Radiological orientation
- Appropriate portions of 10 CFR 26
- Appropriate portions of 10 CFR 19

3.3.2 Radiation Worker Training

Personnel whose job duties require unescorted access to radiologically controlled areas of the plant will receive instruction in the applicable aspects of radiation protection. Radiation Worker Training will include the following topics:

- Sources of radiation
- Types and measurement of radiation
- Biological effects of radiation
- Limits and guidelines, including Reg. Guide 8.13
- Concept of As Low As Is Reasonably Achievable (ALARA)
- Radiation dosimetry
- Contamination
- Internal exposure
- Radiation work permits
- Radiological postings
- Radiological alarms
- Radioactive waste
- Rights and responsibilities
- Protective clothing

3.3.3 General Employee Requalification Training

Personnel with unescorted access to the plant participate in annual requalification training. Requalification training will include those topics in 3.3.1 and 3.3.2, as applicable to continue to meet access requirements. Emphasis will be placed on changes to the plant, plant procedures and procedure changes, government regulations, and quality assurance requirements. As applicable, training will be conducted on industry operating experiences, Licensee Event Reports, and personnel errors.

Based on the staff's review of the "General Employee Training" (GET) section of NEI 06-13 outlined above, the staff concludes that NEI 06-13 clearly and sufficiently describes, in terms of scope and level of detail, the training programs for general employee training to enable a reasonable assurance finding of acceptability for issuance of a combined license with verification of the programs during the construction stage.

3.4 Selected Other Training Programs

The "Selected Other Training Programs" section of NEI 06-13 addresses training for positions not specified by either 10 CFR 55, "Operators' Licenses" or 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel."

3.4.1 Fire Protection Training

NEI 06-13 states that the training programs for fire protection personnel will be designed, developed, implemented, and maintained using the SAT process as defined by 10 CFR 55.4 and as endorsed by Regulatory Guide-1.8. In addition, initial fire protection training will be completed prior to receipt of fuel at the site. Personnel assigned as fire brigade members will receive formal training prior to assuming brigade duties. Fire brigade members will also receive regularly scheduled retraining. Fire brigade training will comply with National Fire Protection Association Standard 600, "Standard on Industrial Fire Brigades."

Training appropriate to the assigned work will be provided for the fire protection staff, fire watch personnel, and the general employee. Final Safety Analysis Report (FSAR) Section 9.5.1, "Fire

Protection Program" will include additional information regarding the fire protection training programs.

3.4.2 Emergency Plan Training Program

NEI 06-13 states that Emergency Plan training will meet the requirements of 10 CFR 50 Appendix E, Section IV. F, "Training" and 10 CFR 50.47(b)(15). Additional information about the Emergency Plan training program will be found in the Emergency Plan, which is a separate document.

3.4.3 Physical Security Training Program

NEI 06-13 states that training of security personnel will be discussed in FSAR Section 13.6, "Physical Security" and in the Physical Security Plan.

3.4.4 Station Management Training Program

NEI 06-13 states that station supervisors will receive Fitness for Duty training in accordance with 10 CFR 26.22. The qualification requirements for managers and middle managers include training or experience in supervision or management. Training for supervisors develops their skills in the following areas:

- Leadership
- Interpersonal communications
- Management responsibilities and limits
- Motivation of personnel
- Problem analysis and decision making
- Administrative policies and procedures
- Observation skills
- Coaching

Based on the staff's review of the "Selected Other Training Programs" section of NEI 06-13 outlined above (fire protection, emergency plan, physical security, and station management training programs), the staff concludes that NEI 06-13 clearly and sufficiently describes, in terms of scope and level of detail, the training programs for fire protection, emergency plan, physical security, and station management training to enable a reasonable assurance finding of acceptability for issuance of a combined license with verification of the programs during the construction stage.

3.5 Training Effectiveness Evaluation Program

NEI 06-13 states that the program to evaluate the effectiveness of training programs will be based on three independent inputs: the supervisor of the trainee, the trainee, and an educational content evaluation of the instructional techniques and materials.

3.5.1 Supervisory Review for Training Effectiveness

The supervisory review will evaluate the content and effectiveness of training programs as related to the duties and job responsibilities of the trainees. Reviews may be performed by the

supervisor of the trainee (former student) meeting with appropriate Training Department personnel, by designated oversight personnel (Quality Assurance or instructional technologists), or by observing employee performance in the job setting.

Management observations of training will be discussed to determine topics that may require additional training or subjects that may be removed from the training program.

3.5.2 Trainee Review of Training Effectiveness

Following selected courses or training cycles, trainees will have the opportunity to provide comments regarding the effectiveness of the instructional methods and content relevancy to their jobs. These comments will used in the evaluation of both instruction and content of the training program.

3.5.3 Review for Effectiveness of Instructional Techniques and Materials

The effectiveness of instructional techniques and materials review assesses the clarity and applicability of training material and instructional aids. Management observations of instructors in the teaching environment will be conducted by an educational specialist qualified to monitor and evaluate classroom performance. Full time instructors will receive basic indoctrination in instructional techniques as soon as practicable after assuming instructional duties. The educational specialist will conduct periodic seminars in instructional techniques, discussing areas where group performance could be improved and recommends innovative techniques observed at this or other power stations.

Based on the staff's review of the "Training Effectiveness Evaluation Program" section of NEI 06-13 outlined above, the staff concludes that NEI 06-13 clearly and sufficiently describes, in terms of scope and level of detail, the training effectiveness evaluation program to enable a reasonable assurance finding of acceptability for issuance of a combined license with verification of the programs during the construction stage.

4.0 CONCLUSION

Operator Licensing and Human Performance Branch (COLP) staff used the acceptance criteria of SRP 13.2.1 and 13.2.2 as the basis for evaluating the acceptability of NEI 06-13, "Template for an Industry Training Program Description," Revision 0. The COLP staff has determined that NEI 06-13, "Template for an Industry Training Program," Revision 0 is consistent with the training and qualification requirements, guidance, and industry standards for licensed and nonlicensed plant staff as outlined in Section 2.0 of this evaluation with verification of the programs during the construction stage.

The training programs for licensed and nonlicensed plant staff described in NEI 06-13 will incorporate instructional requirements to qualify personnel to operate and maintain the facility, in a safe manner, in all modes of operation. The training programs will be developed and maintained in compliance with the facility license and applicable regulations. The training programs will be periodically evaluated and revised to reflect industry experience; to incorporate changes to the facility, procedures, regulations, and quality assurance requirements; and by management to determine overall program effectiveness. The training programs will be further

described in site and/or corporate procedures. Sufficient records will be maintained and kept available for NRC inspection during construction to verify adequacy of the programs.

The results of reviews of operating experience will be incorporated into the training and retraining programs in accordance with the provisions of TMI Action Item I.C.5, Appendix 1A. Training programs will encompass all phases of plant operation including preoperational testing and low-power operation in accordance with the provisions of TMI Action Item I.G. Sufficient plant staff will be trained prior to fuel load to provide for safe plant operations.

The licensed operator training program, to be derived using SAT principles, will be developed by the applicant and will meet the regulatory guidance of Regulatory Guide 1.8 and 10 CFR Part 55. Licensed operators and senior operators will receive training in security procedures, radiological emergency plans, administrative procedures, and radiation protection. Simulation facilities used for the licensed operator training program will meet the guidance of Regulatory Guide 1.149. The licensed operator requalification training program conforms to the requirements of 10 CFR Part 50 and 10 CFR 55.59 and follows the guidance in Regulatory Guide 1.8. Sufficient licensed operators will have completed the training program prior to fuel load to ensure that the minimum shift staffing requirements of 10 CFR 50.54 will be met. The licensed operator training program will be verified during the construction stage.

In accordance with the requirements of 10 CFR 50.34(a) and (b), the applicant has provided information related to its training program for nonlicensed personnel. The training and retraining of nonlicensed plant staff will meet the guidance of Regulatory Guide 1.8. The applicant has committed to establish, implement, and maintain training programs that will utilize a systems approach to training as required by 10 CFR 50.120 and as defined in 10 CFR 55.4. All initial training of the nonlicensed plant staff is scheduled to be completed prior to fuel loading. Training programs for personnel listed in 10 CFR 50.120 will be verified during the construction stage.

The applicant will meet the requirements of 10 CFR 19 by developing and implementing a training program that will inform and instruct personnel regarding radioactive materials and radiation, health protection problems associated with exposure to radiation, the means and responsibilities for the protection of workers from radiation, and the availability upon request of radiation exposure reports. The training program includes initial training and periodic retraining for categories of employees and nonemployees whose assistance may be needed in the event of a radiological emergency. The GET program will be verified during the construction stage.

The applicant will meet the requirements of 10 CFR Part 26 by having a training program to ensure that personnel are adequately informed regarding the fitness-for-duty policy. Supervisors and persons assigned to escort duties will be trained to ensure that they understand their roles, responsibilities, and procedures for the fitness-for-duty program. The fitness-for-duty training program will ensure supervisors and escorts will possess knowledge and skills necessary to recognize behavioral changes, drugs, and/or indications of the use of drugs. The fitness-for-duty training program will be verified during the construction stage.

NEI 06-13 states that training will be provided based on individual employee experience, the intended position, and previous training and education of the individual. Training Department personnel may be supplemented by other personnel such as subject matter experts, contract

staff, and vendor representatives. Formal instruction will be presented through a combination of classroom lectures, e-learning, assigned reading, simulator training and evaluations, and other delivery techniques.

On the basis of its review, the staff concludes that NEI 06-13, “Template for an Industry Training Program,” Revision 0 adequately provides guidance for establishing the licensed operator and nonlicensed plant staff training programs. Accordingly, the COLP staff concludes that NEI 06-13, “Template for an Industry Training Program,” Revision 0 complies with the applicable NRC regulations, guidance, and industry standards and can be utilized by applicants for combined license applications.

5. REFERENCES

5.1 Heymer, A. P., Nuclear Energy Institute, to the U.S. NRC, NEI 06-13, “Template for an Industry Training Program Description," October 30, 2006.

5.2 NUREG-0800, "Standard Review Plan," Section 13.2.1, “Reactor Operator Training,” and Section 13.2.2, “Training for Nonlicensed Plant Staff”

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