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Constellation Energy

• Nine Mile Point Nuclear Station

December 20, 2007

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station
Unit Nos. 1 & 2, Docket Nos. 50-220 & 50-410

Request For License Amendment to Revise Nine Mile Point Units 1 and 2 Technical Specifications 6.3 and 5.3, Unit Staff Qualifications

REFERENCE: (a) Nine Mile Point Unit 1 Technical Specifications Amendment No. 160,
dated February 19, 1998 (TAC No.M98841)

Pursuant to 10 CFR 50.90, Nine Mile Point Nuclear Station, LLC, (NMPNS) hereby requests an amendment to the Nine Mile Point Unit 1 (NMP1) Renewed Facility Operating License DPR-63, and the Nine Mile Point Unit 2 (NMP2) Renewed Facility Operating License NPF-69. The proposed changes to the Technical Specifications (TS) contained herein would revise TS Section 6.3, "Unit Staff Qualifications," for NMP1 and TS Section 5.3, "Unit Staff Qualifications," for NMP2. The proposed changes would revise education and experience eligibility requirements for operator license applicants that have become outdated due to the accreditation of the licensed operator training program by the Institute of Nuclear Power Operations. Additionally, the proposed change to NMP1 TS Section 6.3 would eliminate a previous NRC approval (Reference a) that granted an exception to the American National Standard Institute (ANSI) Standard N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel" for the qualification requirements for the position of Manager Operations. NMPNS has concluded that the activities associated with the proposed changes represent no significant hazards consideration under the standards set forth in 10 CFR 50.92.

The Enclosure provides a description and technical bases for the proposed changes and existing TS pages marked up to show the proposed changes.

The enclosed submittal contains no regulatory commitments.

Approval of the proposed amendments is requested by December 31, 2008, with implementation within 60 days of receipt of the approved amendments.

Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this license amendment request, with Enclosure, to the appropriate state representative.

Should you have any questions regarding the information in this submittal, please contact T. F. Syrell, Licensing Director, at (315) 349-5219.

Very truly yours,



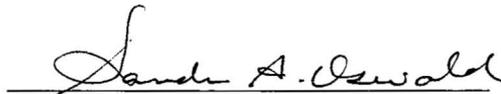
STATE OF NEW YORK :
: TO WIT:
COUNTY OF OSWEGO :

I, Keith J. Polson, being duly sworn, state that I am Vice President-Nine Mile Point, and that I am duly authorized to execute and file this license amendment request on behalf of Nine Mile Point Nuclear Station, LLC. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other Nine Mile Point employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of New York and County of Oswego, this 20th day of December, 2007.

WITNESS my Hand and Notarial Seal:


Notary Public

My Commission Expires:

10/25/09
Date

SANDRA A. OSWALD
Notary Public, State of New York
No. 01OS6032276
Qualified in Oswego County
Commission Expires 10-25-09

KJP/GB

Enclosure: Evaluation of the Proposed Changes

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cc: S. J. Collins, NRC Regional Administrator, Region I
E. C. Knutson, Senior NRC Resident Inspector
J. P. Spath, NYSERDA
M. J. David, NRC Project Manager

ENCLOSURE

EVALUATION OF THE PROPOSED CHANGES

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1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Renewed Operating License DPR-63 for Nine Mile Point Unit 1 (NMP1) and Renewed Operating License NPF-69 for Nine Mile Point Unit 2 (NMP2).

The proposed change would revise NMP1 Technical Specification (TS) Section 6.3, "Unit Staff Qualifications," and NMP2 TS 5.3, "Unit Staff Qualifications," to update requirements that have been outdated due to the accreditation of Nine Mile Point Nuclear Station, LLC (NMPNS) licensed operator training program and promulgation of the revised 10 CFR 55, "Operators' Licenses," which became effective on May 26, 1987 (52 FR 9453) (Reference 1). Additionally, the proposed change would revise NMP1 TS Section 6.3 by eliminating the qualification requirement "exceptions" listed for the position of Manager Operations. The position of Manager Operations will meet the minimum qualification requirements as required in American National Standard Institute (ANSI) Standard N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel" (Reference 2).

Attachment 1 to this Enclosure contains existing TS pages marked up to show the proposed amendment changes.

2.0 DETAILED DESCRIPTION

2.1 NMP1

The proposed amendment would revise TS 6.3.1 to specify an exception to the unit's minimum staff qualifications of ANSI N18.1-1971 for operator license applicants. The exception would require operator license applicants to meet the education and experience guidelines endorsed by the National Nuclear Accrediting Board (NNAB) as outlined in this amendment request. The proposed amendment would also remove the current qualification requirement "exceptions" listed for the Manager Operations position.

TS 6.3.1 will be revised to state:

Each member of the unit staff, with the exception of the operator license applicants and the radiation protection manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The education and experience eligibility requirements for operator license applicants and changes thereto, shall be those previously reviewed and approved by the NRC; specifically, those referenced in letter NMP1L 2184, dated December 20, 2007, and described in applicable station training procedures.

2.2 NMP2

The proposed amendment would revise TS 5.3.1 to specify an exception to the unit minimum staff qualifications of American National Standard Institute/American Nuclear Society (ANSI/ANS) -3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel" (Reference 3). The exception would require operator license applicants

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to meet the education and experience guidelines endorsed by the NNAB as outline in this amendment request.

TS 5.3.1 will be revised to state:

Each member of the unit staff, with the exception of the operator license applicants and the radiation protection manager, shall meet or exceed the minimum qualifications of ANSI/ANS 3.1- 1978 for comparable positions. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The education and experience eligibility requirements for operator license applicants and changes thereto, shall be those previously reviewed and approved by the NRC; specifically, those referenced in letter NMP1L 2184, dated December 20, 2007, and described in applicable station training procedures.

3.0 TECHNICAL EVALUATION

3.1 Staff Qualifications for Licensed Operators

The changes proposed by this amendment request would revise requirements regarding facility and staff qualifications and licensed operator training programs at the NMPNS. The requested changes would update requirements that have been outdated based on the licensed operator training programs being accredited by the Institute of Nuclear Power Operations (INPO), promulgation of the revised 10 CFR 55, "Operators' Licenses," and adoption of a systems approach to training as required by 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel."

The proposed revisions to both the NMP1 TS Section 6.3, "Unit Staff Qualifications," and the NMP2 TS Section 5.3, "Unit Staff Qualifications," describe the revised requirements for unit staff qualifications for licensed reactor operators (ROs) and licensed senior reactor operators (SROs). The education and experience eligibility requirements for RO and SRO license applicants will be described in applicable station training procedures, and shall be those previously reviewed and approved by the NRC. Changes to the procedures concerning education and eligibility requirements will not be made without prior NRC approval, procedure changes addressing issues other than education and experience eligibility requirements may be made consistent with the procedure revision process.

As such, NMPNS requests NRC approval of the methods described in the current National Academy for Nuclear Training (NANT), "Guidelines for Initial Training and Qualifications of Licensed Operators," for meeting the education and experience eligibility requirements at NMP1 and NMP2. Precedence for this change is identified in section 4.2. This change is administrative in nature and does not impact the accident analyses described in the NMP1 Updated Final Safety Analysis Report (UFSAR) or the NMP2 Updated Safety Analysis Report (USAR).

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3.2 Elimination of Amended Manager of Operations Qualification Requirements at NMP1

The change proposed by this amendment request would eliminate a previous NRC approval (Reference 4) that granted an exception to ANSI N18.1-1971 regarding qualifications for the position of Manager Operations. The proposed change would re-establish NMP1 to full compliance with ANSI N18.1-1971 qualification requirements for the position of Manager Operations. All minimum education and experience requirements for the position of Manager Operations, as outlined in ANSI N18.1-1971, will be met by the person appointed to that position.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

4.1.1 Staff Qualifications for Licensed Operators

On March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel (50 FR 11147) (Reference 5) which endorsed the training accreditation program developed by INPO, in association with its NANT. Subsequently, in NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," (Reference 6) and NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," (Reference 7), the NRC indicated it would accept a licensee's licensed operator training program if it is accredited and based on a systems approach to training. This accreditation obviates the need to conform to the guidance of either ANSI N18.1-1971 or ANSI/ANS 3.1-1978. NUREG-1262 notes that ANSI N18.1-1971 and ANSI/ANS 3.1-1978 may be superseded by INPO accreditation in accordance with the revised 10 CFR 55, and that licensees may submit a request to the NRC for an administrative change to their TS to revise or delete, as appropriate, the TS requirements which have been superseded.

In addition, the NRC has published NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001 (Reference 8), to familiarize licensees with the NRC's current guidelines for the qualification and training of reactor operator and senior operator license applicants. The document acknowledges that 10 CFR 55.31(a)(4) allows the NRC to accept an application for an operator's license if the facility licensee certifies that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training. RIS 2001-01 further makes the following statements:

"...a facility licensee's training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board (NNAB)."

"The fact that every facility licensee has voluntarily obtained and periodically renewed the accreditation of its licensed operator training program suggests that every facility licensee is implementing the education and experience guidelines endorsed by the NNAB. The NRC staff understands that the current version of those guidelines are outlined by the National Academy for Nuclear Training (NANT) in its "Guidelines for Initial Training and Qualification of Licensed Operators," (NANT 2000 guidelines) which were issued in January 2000."

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“...the NANT’s guidelines for education and experience (those that were in effect in 1987 or those that were issued in January 2000) outline acceptable methods for implementing the Commission’s regulations in this area.”

“The staff encourages all facility licensees to review their requirements and commitments related to RO and SO education and experience and to update their documentation (e.g., FSAR, TS, and training program descriptions) to enhance consistency and minimize confusion.”

4.1.2 Elimination of Amended Manager Operations Qualification Requirements at NMP1

On February 19, 1998, the commission approved the NMP1 amendment application which, in part, revised NMP1’s commitment to ANSI N18.1-1971 for the position of Manager Operations. The revised TS Section 6.3.1 allowed the Manager Operations, in lieu of meeting the ANSI N18.1-1971 requirement of holding an SRO license, to (1) hold an SRO license at the time of appointment, or (2) have held a license at NMP1 or a similar unit, or (3) have been certified for equivalent SRO knowledge.

The administration of the Operations Department organization for both NMP1 and NMP2 is now under the responsibility of one Manager Operations as defined in both the NMP1 UFSAR and the NMP2 USAR. Therefore, NMPNS is submitting this amendment request to eliminate the previously approved exception. The position at the functional level of Manager Operations position will continue to meet the NMP1 TS qualifications requirements of ANSI N18.1-1971 while also meeting the NMP2 TS qualification requirements of ANSI/ANS 3.1-1978.

4.2 Precedent

The NRC has previously approved similar changes to revise “Unit Staff Qualifications,” for RO and SRO applicants using the NANT guidelines for: Palo Verde Nuclear Generating Station (TAC Nos. MB8766, MB8767, MB8768, Amendment No.148); LaSalle County Station, Units 1 and 2 (TAC Nos. MB2690 and MB 2691, Amendment No.140); and Oyster Creek Generating Station (TAC No. MB2694, Amendment No.232) respectively.

4.3 Significant Hazards Consideration

Nine Mile Point Nuclear Station (NMPNS) is requesting revisions to Nine Mile Point Unit 1 (NMP1) Technical Specification (TS) 6.3, “Unit Staff Qualifications,” and the Nine Mile Point Unit 2 (NMP2) TS 5.3, “Unit Staff Qualifications.” The proposed changes would require licensed operator applicants to comply with the requirements of the National Academy for Nuclear Training guidelines in lieu of American National Standards Institute (ANSI) Standard N18.1-1971, “American National Standard for Selection and Training of Nuclear Power Plant Personnel” and American National Standards Institute/American Nuclear Society (ANSI/ANS) 3.1-1978, “American National Standard for Selection and Training of Nuclear Power Plant Personnel.”

Additionally, NMPNS is requesting revisions to NMP1 TS 6.3, “Unit Staff Qualifications” to eliminate the qualification requirement “exceptions” listed for the position of Manager Operations. The position of Manager Operations would meet the minimum qualification requirements as required in ANSI N18.1-1971.

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NMPNS has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed Technical Specifications change to the licensed operator qualification requirements is an administrative change to revise the present operator qualification program to the more current National Academy for Nuclear Training (NANT) guidelines for initial training and qualification of licensed operators. The change conforms to the current requirements of 10 CFR 55, "Operator's Licenses."

Although the licensed operator qualification and training program may have an indirect impact on accidents previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR 55 rule, concluded that this impact remains acceptable as long as the licensed operator training program is accredited and is based on a systems approach to training. NMPNS's licensed operator training program is accredited by the Institute of Nuclear Power Operation (INPO) and is based on a systems approach to training.

The proposed Technical Specifications amendment to re-establish a previously revised commitment to administer the standards of ANSI N18.1-1971 for the position of Manager Operations is also an administrative change. The change does not alter the manner in which the plant systems are operated.

Therefore, the proposed changes do not involve a significant increase in probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed TS change to clarify the current requirements for licensed operator qualification and the licensed operator training program are administrative changes, and conform to the requirements of 10 CFR 55. The TS requirements for all other unit staff qualifications remain unchanged.

Although licensed operator qualification and training may have an indirect impact on the possibility of a new or different kind of accident from any accident previously evaluated, the NRC considered this impact during the rule making process, and by promulgation of the revised rule, concluded that this impact remains acceptable as long as the licensed operator training program is accredited and based on a systems approach to training. As previously noted, NMPNS licensed operator training program is accredited by INPO and is based on a systems approach to training.

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The proposed TS change to delete a previously approved exception to the qualification requirements contained in ANSI N18.1-1971 for the position of Manager Operations is also an administrative change.

None of the precursors of previously evaluated accidents are affected by these changes, and no new failure modes are introduced. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed TS change to update the current requirements applicable to licensed operator qualification and the licensed operator training program are administrative changes. The change is consistent with the requirements of 10 CFR 55. The TS qualification requirements for all other unit staff remain unchanged.

Licensed operator qualification and training can have an indirect impact on a margin of safety. However, the NRC considered this impact during the rule making process, and by promulgation of the revised 10 CFR 55, determined that this impact remains acceptable when licensees maintain a licensed operator training program that is accredited and based on a systems approach to training. As previously noted, the NMPNS licensed operator training program is accredited by INPO and is based on a systems approach to training.

The NRC has concluded, as stated in NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal regulations, Part 55 on Operators' Licenses," that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. As a result, maintaining an INPO accredited, systems approach based licensed operator training program is equivalent to maintaining an NRC approved licensed operator training program which conforms with applicable NRC Regulatory Guides or NRC endorsed industry standards. The margin of safety is maintained by virtue of maintaining an INPO accredited licensed operator training program.

In addition, the NRC has published NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001, "to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator and senior operator license applicants." This document again acknowledges that the INPO National Academy for Nuclear Training (NANT) guidelines for education and experience, outline acceptable methods for implementing the NRC's regulations in this area.

The proposed Technical Specifications change to re-establish a previously revised plant commitment to administer the standards of ANSI N18.1-1971 for the position of Manager Operations is an administrative change.

The proposed changes do not involve a physical modification of the plant or involve any changes to the methods in which plant systems are operated. The changes do not,

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in themselves, adversely affect any physical barrier which could contribute to the release of radiation to plant personnel or to the public.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment is confined to changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10).

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. Volume 52, Federal Register, Page 9453 (52 FR 9453), dated March 25, 1987.
2. ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel."
3. ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel."
4. NRC Letter to Mr. B. Ralph Sylvia, Niagara Mohawk Power Corporation "Issuance of Amendment for Nine Mile Point Nuclear Station Unit 1 (TAC No. M98841) (Amendment No. 160), dated February 19, 1998.
5. 50 FR 11147, "Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel," dated March 20, 1985.
6. NRC Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing 10 CFR 55 and Conforming Amendments," dated March 19, 1987.
7. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," published November 1987.

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8. NRC Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," dated January 18, 2001.

ATTACHMENT 1

TECHNICAL SPECIFICATION (TS) PAGE MARKUPS

Nine Mile Point Unit 1

TS Page 349

Nine Mile Point Unit 2

TS Page 5.3-1

Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. As a minimum, either the Manager Operations or the General Supervisor Operations shall hold an SRO license.
- f. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervision in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

6.3 Unit Staff Qualifications

SEE Insert "A" 6.3.1 ~~Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for; the Manager Operations who, in lieu of meeting the senior reactor operator license requirements of ANSI N18.1-1971, shall 1) hold a senior reactor operator license at the time of appointment, or 2) have held a senior reactor operator license at Nine Mile Point Nuclear Station Unit 1 or at a similar unit, or 3) have been certified for equivalent senior reactor operator knowledge; and the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~

6.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of Specification 6.3.1, perform the functions described in 10 CFR 50.54(m).

6.4 Procedures

6.4.1 Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and cover the following activities:

- a. The applicable procedures recommended in Regulatory Guide 1.33, Appendix A, November 3, 1972;

Insert "A"

Each member of the unit staff, with the exception of the operator license applicants and the radiation protection manager, shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC; specifically, those referenced in letter NMP1L 2184, dated December 20, 2007, and described in applicable station training procedures.

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 ~~Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions, except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~

SEE Insert "B"

Insert "B"

Each member of the unit staff, with the exception of the operator license applicants and the radiation protection manager, shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The education and experience eligibility requirements for operator license applicants, and changes thereto, shall be those previously reviewed and approved by the NRC; specifically, those referenced in letter NMP1L 2184, dated December 20, 2007, and described in applicable station training procedures.