

**Appendix A**

**Construction Inspector Basic-Level  
Training and Certification Journal**

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ATTACHMENT 1 Revision History for IMC 1252 Appendix A

## Introduction

The inspector training and qualification program requires that you complete a variety of activities, each of which is designed to help you learn information or practice a skill that will be important to performing the job of an inspector. When you have completed the entire qualification process, you will have demonstrated each of the competencies that describe a successful inspector.

A competent inspector must:

1. Understand the legal basis for and the regulatory processes used to achieve the NRC's regulatory objectives by:
  - acquiring a fundamental understanding of the USNRC organizational structure and objectives (Regulatory Framework)
  - understanding the basis for the authority of the agency (Regulatory Framework)
  - understanding the processes established to achieve the regulatory objectives (Regulatory Framework)
2. Understand the technology and apply concepts in various technical areas to allow the NRC to carry out its overall responsibilities by:
  - understanding science and engineering fundamentals utilized in the design and construction of nuclear power plants and fuel fabrication facilities (Fundamental Plant Design and Construction)
  - developing and maintaining an understanding of how basic nuclear plant and fuel facility design and construction requirements provide for protection of public health and safety (Fundamental Plant Design and Construction)
  - using knowledge of a specific reactor type or within a specialized technical area to identify, address and resolve regulatory issues (Technical Area Expertise)
3. Master the techniques and skills needed to collect, analyze, and integrate information using a safety focus to develop a supportable regulatory conclusion by:
  - independently gathering information through objective review, observation, and open communications (Inspection)
  - determining acceptability of information by comparing to established criteria (Inspection)
  - approaching problems objectively, gathering and integrating information, and developing a comprehensive understanding before reaching a conclusion (Problem Analysis)
  - objectively analyzing and integrating information using a safety focus to identify the appropriate regulatory conclusion and regulatory response (Assessment and Enforcement)

4. Have the personal and interpersonal skills to carry out their assigned regulatory activities either individually or as part of a team by:
  - clearly expressing ideas or thoughts, carefully listening, and speaking and writing with appropriate safety focus and context (Communication)
  - working collaboratively with others toward common objectives (Teamwork)
  - working independently, exercising judgment, and exhibiting flexibility in the completion of activities including during difficult or challenging situations (Self-Management)
  - using technology to gather, manipulate, and share information (Information Technology)

## Program Organization

The inspector qualification process has two levels. The first level is the Basic-Level. Basic-level activities are designed to help you develop an awareness of the role of the Agency, your role as an inspector, and the technology you will be inspecting. Successfully completing the Basic-level work will provide you with a context for meaningful learning during on-site work and a foundation for in-depth learning at the next level. After successfully completing the Basic-level activities, you will be eligible to receive a *Basic Inspector Certification*.

With a *Basic Inspector Certification* you may be assigned to perform limited scope inspection activities under an appropriate degree of detailed supervision. The scope of your assigned inspection activities will be controlled by your immediate supervisor. Typically, your supervisor will review your work in detail at specified points during the course of your qualification process. You can be asked to conduct inspection activities but will not be expected to independently reach conclusions, describe official agency positions on evolving issues, or act as an official agency spokesperson. The emphasis in the inspector qualification program is on competencies. There is no set time for completing each segment of the program nor do the on-the-job activities specify an exact number of times you must practice a task. You must practice until you can perform inspector tasks successfully in accordance with the evaluation criteria. Therefore, the time needed to complete all of the requirements to receive a *Basic Inspector Certification* will vary based on your previous education, training, and experience. Most employees will require several months to complete the work to be eligible to achieve *Basic Inspector Certification*.

The second level of the qualification process is the General Proficiency-Level. The General Proficiency activities are designed to develop your interpersonal and inspection skills. The final activity in the General Proficiency-Level is to appear before a qualification board. Successful completion of the board is intended to demonstrate that you have a sufficiently integrated understanding of the role of the Agency, the inspection program, and your role as an inspector to act independently in the field. Upon successful completion of all the General Proficiency-Level activities, including the qualification board, you will be eligible to receive *Full Inspector Qualification*. As a fully qualified Inspector you will be assigned the full scope of inspection activities to perform independently.

There are **two** Qualification Journals (Basic-Level **and** General Proficiency-Level) you will need to complete during the inspector qualification process. Each journal identifies the classroom requirements and provides the individual study activities, **the rotation** and **the** on-the-job learning activities you must complete. The signature cards and certifications, which you will use to document your progress as you move through the Basic-Level **and** General Proficiency-Level, can be found at the end of each journal. Each journal also contains a form to document the justification for accepting equivalent training or experience as a means of meeting an inspector qualification requirement. The signature cards, certification pages, and equivalency justification pages will become the permanent record of your completion of the inspector qualification program and will be placed in your official file.

### **Required Basic-Level Training Courses**

These courses can be taken in any order, with the exception of G-104, which should be taken after you have completed the majority of the other work in this journal.

- Power Plant Engineering (E-110)
- Expectations for Inspectors (G-104)
- Industrial Safety Indoctrination
- Site Access Training (H-100)
- Reactor Concepts Course (R-100)
- Ethics Training - Web-based as part of ISA-3
- Allegations Training - Web-based as part of ISA-5
- Information Security (INFOSEC) Awareness Training - Web-based

## Technical Training

Technical training may be started at the Basic-Level, provided that the training does not identify that successful completion of Basic-Level Certification is a prerequisite.

### Basic-Level Individual Study Activities

***Note: Some of the Construction Inspection Program Inspection Manual Chapters (IMCs) and other guidance may still be in draft. Use the latest draft IMCs and guidance documents while fully discussing with your supervisor any limitations to using the information and the extent of applicability to your training.***

The individual study activities are designed to direct and focus your efforts as you begin reviewing documents that will be important to the performance of your job. Each study activity begins with a **purpose** statement informing you of why the activity is important and how it relates to the job of an inspector. The **level of effort** has been noted so that you have an idea of how much effort should be expended in completing the activity. (Of course, the times are estimates. You may need a little more or a little less time - but use the level of effort as an estimate.) The **evaluation criteria** are listed up front so that you will review them first and better understand what you are expected to achieve as a result of completing the activity. Use the evaluation criteria to help you to focus on what is most important. The **tasks** outline the things you must do in order to successfully address the evaluation criteria.

#### The following general guidance applies as you complete the various study activities:

- The first three individual study activities should be done first. Becoming familiar with the Agency, the internal and external web sites, and your overall role as an inspector is important for successfully completing many of the remaining activities. You should also become familiar with the content of the remaining activities so that you can complete the activities as opportunities arise.
- Complete all parts of each activity.
- Your supervisor will act as a resource as you complete each activity. Your supervisor may also designate other fully qualified individuals to work with you as you complete the various activities. Discuss any questions you may have about the content of anything you read with your supervisor or designated resource.
- You are responsible for keeping track of what tasks you have completed. Be sure to complete all the tasks in each activity before meeting with your supervisor **or designated fully qualified individual** for evaluation.

## **Basic Level Individual Study Activities**

### **Basic-level Individual Study Activity**

**TOPIC:** (ISA-1) History and Organization of the Nuclear Regulatory Commission

**PURPOSE:** The purpose of this activity is to familiarize you with the regulatory history of the commercial nuclear industry and the evolution of the regulatory framework under which today's NRC staff functions. During this activity you will review the organization of the agency and its staff and the relationships between the major offices.

**COMPETENCY AREA:** REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 8 hours

**REFERENCES:** Title 10 of the Code of Federal Regulations (CFR)  
  
NUREG-1350, USNRC Information Digest  
  
NUREG/BR-0175, "A Short History of Nuclear Regulations," Rev. 1, June 2000

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the Agency's regulatory history and development of the commercial applications of nuclear energy, by successfully doing the following:

- 1 Discuss the purpose of the Atomic Energy Act of 1954, as amended.
2. Discuss the major regulatory impacts of the Energy Reorganization Act of 1974, as amended.
- 3 Outline the major offices and briefly describe the functioning of the following: the Commission; the office of the Inspector General; Office of SECY; ASLB; ACRS; commission staff and program offices, including Chief Information Officer, Chief Financial Officer, Executive Director for Operations.
- 4 Describe your Region's or Office's organization and key management positions.
- 5 Discuss the relationship between the NRC and the Department of Energy.



**TASKS:**

1. Obtain paper copies or locate and bookmark electronic locations of the above stated reference material for personal use and future reference. Some documents may be available through the regional public affairs office. Electronic copies can be found on the NRC External Website in the Electronic Reading Room.
2. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
3. Review and discuss the evaluation criteria with your supervisor.

**DOCUMENTATION:**

Basic-level Certification Signature Card Item ISA-1

## Basic-level Individual Study Activity

**TOPIC:** (ISA-2) Navigating the NRC's Internal and External Web Pages

**PURPOSE:** The purpose of this activity is to familiarize you with the NRC's internal and external web sites and to acquaint you with the information available. Inspectors must routinely review a variety of documents to support their inspection activities. Many of these documents are now available electronically. This individual study activity will familiarize you with the web locations of documents and information vital to your job. This will begin to build the knowledge you will need later to successfully perform your assigned responsibilities.

**COMPETENCY**

**AREA:** INFORMATION TECHNOLOGY

**LEVEL OF**

**EFFORT:** 8 hours

**REFERENCES:** NRC Internal and External websites

Regional or Office Guidance (as applicable)

**EVALUATION**

**CRITERIA:** There are no specific evaluation criteria for this activity. Use your supervisor or other Agency personnel as a resource as you complete this activity.

***Note: Circumstances may result in some parts of the web pages being unavailable at times. Complete as much as is possible.***

***Note: There are often several ways to reach a particular piece of information. As you navigate the various web sites, you will be directed to bookmark specific information that you will need to access later to complete other activities in this Manual Chapter.***

**TASKS:** Open your web browser and do the following:

1. Explore the NRC's Internal Home Page.
  - a. Review the material available under "Policy". Review the topics covered by the Field Policy Manual.

- b. Locate the Ethics area:
  - i. Review the information available.
  - ii. Note the various sources of ethics advice.
- c. Locate the Office of New Reactors (NRO) Home Page (Hint: NRO is a Program Office):
  - i. Identify the Director, NRO.
  - ii. For the Division of Construction, Inspection, and Operational Programs, find and review the office **organization**.
  - iii. Review the Construction Inspection Program.
  - iv. Review the New Reactor Planning status.
- d. Locate the Office of Nuclear Reactor Regulation's (NRR's) Home Page (Hint: NRR is a Program Office):
  - i. Identify the Director, NRR.
  - ii. For research and test reactor inspectors, find and review the office organization, the work planning center, Program Support, the RPS help site and Office Letters/ Instructions.
  - iii. For power reactor inspectors, find the ROP Digital City and bookmark it. You will need the location of Digital City to complete other individual study activities.
- e. Locate the Office of Federal and State Materials and Environmental management program's (FSME's) home page. Review the functions of this program office.
- f. Locate the Office of Nuclear Materials Safety and Safeguards' (NMSS) Home Page and review the functions of the office.
- g. Locate the Office of Enforcement's home page and book mark it. Review the functions of the office.
- h. Locate the Office of the Secretary's (SECY) home page:
  - i. Review the functions of the office.
  - ii. Review the purpose of a SECY paper.
  - iii. Review the purpose of Staff Requirements Memoranda.
- i. Review the information found on each of the NRC Regions web sites (if available).
- j. Locate the site for NRC Management Directives (MDs):

- i. Find the MD dealing with the NRC Incident Investigation Program; review the purpose of the program.
    - ii. Find the MD dealing with the Management of Allegations; describe the general policy on disclosure of the identity of an alleged.
  - k. Locate the Agency's Employee Training and Development web site:
    - i. Locate the Schedule - find the next presentation of the Westinghouse Simulator Refresher course (R-704P) or the Health Physics Technology course (H-201).
    - ii. Review how to enroll in a course.
    - iii. Locate Self-Paced Learning area.
    - iv. Find the web-based Allegation Management training.
    - v. Review the list of available web-based learning opportunities.
    - vi. Review the list of other available self-paced learning opportunities.
  - l. Locate the Library Services Area (NRC Technical Library).  
**Review the information available.**
- 2. Explore the NRC's External (Public) Server.
  - a. Go to the Electronic Reading Room:
    - i. Find the Glossary of Nuclear Terms (**Electronic Reading Room**-Basic References).
    - ii. Find the NRC Inspection Manual and bookmark it (Collection of Documents).
    - iii. Find Regulatory Guides. Read about the purpose of a Regulatory Guide.
    - iv. Locate Generic Communication Documents. Review the purpose of each of the types of generic communication documents.
    - v. Find NUREGs. Read about the different types of NUREG documents and determine how you can tell the difference.
    - vi. Find the NRC Regulations contained in Title 10 of the Code of Federal Regulations (CFR):
      - 1. How many volumes comprise Title 10? What parts are applicable to the NRC?
      - 2. Use the search feature and search on 'radiation protection'. View one of the documents to read about what a recent change to CFR involved.

- 3. View a part of the CFR. Look for the information that indicates when the regulation was issued and amended.
- vii. Find and review the general purposes and procedures associated with the Privacy and Freedom of Information Acts (FOIA).
- viii. Locate and review the rulemaking process under “What We Do.”

- b. Go to New Reactor Licensing. **Generally review the information relating to the New Reactor Licensing.**
- c. Go to Nuclear Reactors:
  - i. Generally review the information relating to the Reactor Oversight Process.
  - ii. Generally review the information found in the Current Performance Indicators and Inspection Findings area. Choose a plant and review that data.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-2

## Basic-level Individual Study Activity

**TOPIC:** (ISA-3) Inspector Objectivity, Protocol, and Professional Conduct

**PURPOSE:** The purpose of this activity is to acquaint you with the NRC's expectations of inspector conduct and protocol. Objectivity and professionalism are essential to the Agency fulfilling its goals of protecting public health and safety. Inspector conduct is a vital component of the NRC's credibility as an effective regulator. As a qualified inspector, you will often be representing the Agency in interactions with licensee management and workers, local officials, media, and the public. This individual study activity will help you understand NRC procedures, policies, and expectations related to inspector conduct. This activity will also help you develop the professional conduct that you will need to be an effective NRC inspector.

**COMPETENCY  
AREA:** INSPECTION  
SELF-MANAGEMENT

**LEVEL OF  
EFFORT:** 8 hours

**REFERENCES:** NRC Inspection Manual Chapter 0102, "Oversight and Objectivity of Inspectors and **Examiners** at Reactor Facilities"

Management Directive 7.5, "Ethics"

NRC Inspection Manual Chapter 1201, "Conduct of Employees"

NUREG/BR-0075, "Field Policy Manual" No.10, "Conduct of Employees"

NUREG/BR-0075, "Field Policy Manual", No.13, "Witnessing of Unsafe Situations"

Regional or Office guidance related to inspector/employee conduct

**EVALUATION  
CRITERIA:**

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of proper NRC inspector conduct during inspections at nuclear facilities by successfully addressing the following:

1. What are the expectations of NRC employees regarding:

- a. alcohol and illegal drugs?
  - b. official business and personal relationships?
  - c. business partnerships with licensees?
  - d. work habits and professional demeanor?
2. Describe the restrictions regarding the following specific employee activities which could result in a loss of impartiality (or the perception thereof):
  - a. accepting transportation from a licensee.
  - b. attending social functions essentially limited to licensee and contractor attendance.
  - c. coffee clubs, cafeterias, credit union.
  - d. property and neighborhood relationships.
  - e. community activities.
  - f. employment of spouse and children.
3. Explain the Office of Government Ethics (OGE) standards of ethical conduct for the following areas as applicable to NRC inspectors:
  - a. gifts from outside sources.
  - b. gifts between employees.
  - c. conflicting financial interests.
  - d. impartiality in performing official duties.
  - e. seeking other employment.
  - f. misuse of power.
  - g. outside activities.
4. What are the actions expected to be performed by NRC personnel when they identify unsafe work practices or violations which could lead to an unsafe situation?
5. What are the overall requirements used by NRC managers to verify the performance and objectivity of individual inspectors and team leaders during on-site activities at reactor facilities?
6. How do NRC managers with responsibility for oversight of inspectors assess the performance and objectivity of those inspectors? Your answer should include discussion of the specific areas that NRC management should focus on in assessing inspectors.
7. What are the expectations of inspector conduct in a reactor control room during normal, transient, and emergency conditions?

8. What are NRC employees supposed to do if they receive an allegation of improper action by an NRC staff member or contractor involved in inspection or other oversight activities?

**TASKS:**

1. Complete the Ethics Training. To access the training, **perform a search of "Ethics" in the iLearn training** Web Site. Be sure to print the completion record at the end of the on-line ethics course. This must be presented to your supervisor as evidence that you have completed the course.
2. Locate and review the material specifically listed in the Reference section of this activity.
3. Identify, locate, and review your Region's or Office's policy guidance on inspector/employee conduct. Some of this guidance may be located in directives which describe the duties and responsibilities of specific positions (e.g., resident staff or project engineer guidance). You should closely review the guidance applicable to your position.
4. Meet with the regional counsel in your Region or other designated ethics expert and discuss applications of ethics to your role as an NRC employee. Demonstrate your understanding of the guidance by explaining the answers to the first three questions listed in the Evaluation Criteria section of this activity.
5. Meet with your supervisor, your regional counsel, or other designated ethics expert to discuss any questions you may have as a result of this activity. Discuss the items listed under the Evaluation Criteria section of this study activity with your supervisor.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-3



## Basic-level Individual Study Activity

**TOPIC:** (ISA-4) Fitness-For-Duty (FFD) Rule

**PURPOSE:** The purpose of this activity is to provide you with an understanding of the Fitness for Duty Rule. Nuclear power plants and certain other NRC licensees are required to have fitness-for-duty programs which include drug and alcohol testing procedures and other measures to assure that the licensee staff are capable of operating the facilities safely. Research and test reactors are not subject to 10 CFR 26, but per 10 CFR 55.53(k), each licensed operator "...shall participate in any drug and alcohol testing program that may be established for that non-power facility."

**COMPETENCY AREAS:** INSPECTION  
SELF-MANAGEMENT

**LEVEL OF EFFORT:** 3 hours

**REFERENCES:** Enforcement Manual, Chapter 7.15, "Enforcement Actions Involving Fitness-For-Duty (FFD)"

| **10 CFR Part 26 Subpart K, "FFD Programs for Construction"**

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's Fitness-for-Duty Rule by successfully addressing the following:

1. State the purpose of the NRC's Fitness for Duty Rule and which licensees are required to meet this rule.
2. Explain why the Fitness-for-Duty Rule (10 CFR Part 26) is not considered an "unwarranted" invasion of privacy and how licensees implement the requirements.
3. Discuss the enforcement policy related to violations of the Fitness for Duty Rule.

**TASKS:**

1. On the NRC's External Web site, use the search function to find information on "fitness for duty."
2. Read the information on the history of the NRC's Fitness for Duty Program.

3. Explore all aspects of the Fitness for Duty Rule and Drug Testing Program guidance provided on the NRC's Web Site.
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-4

## Basic-level Individual Study Activity

**TOPIC:** (ISA-5) Allegations

**PURPOSE:** The purpose of this activity is to provide you with the opportunity to practice handling an allegation from receipt of the allegation to final disposition. This study activity will help you to effectively interact with individuals bringing concerns to the NRC and to appropriately respond to those concerns.

**COMPETENCY AREA:** INSPECTION  
SELF-MANAGEMENT  
COMMUNICATION

**LEVEL OF EFFORT:** 12 hours

**REFERENCES:** NRC Management Directive 8.8, "Management of Allegations"  
  
Regional or Office guidance on allegations  
  
Office of Enforcement Webpage  
  
Brochure NUREG/BR-0240, Reporting Safety Concerns  
  
External NRC Webpage>About NRC>How We Regulate>Allegations  
  
Fact Sheet on Allegations Process

**EVALUATION CRITERIA:** You will be asked to demonstrate your understanding of how to receive, process, and document an allegation by successfully completing allegation processing activities.

**TASKS:**

1. Complete the web-based training module on Allegations. To access the Allegations Training, **perform a search of "Allegations" in the iLearn training Website**. Be sure to print the completion certificate at the end of the on-line allegations training. You must present the certificate to your supervisor as evidence that you have successfully completed the course.
2. Review the applicable guidance for allegations.
3. Review Brochure **NUREG/BR-0240, Reporting Safety Concerns**.

4. Review internal Office of Enforcement and External NRC web pages for information on Allegations.
5. Attend at least two (2) allegation review boards (ARB) which include both material and reactor allegations on the agenda.
6. Meet with the Allegation Coordinator and have him/her brief you on the allegation process and the Allegation Coordinator's role in the process.
7. Review several allegation files (for closed allegations) and familiarize yourself with the documentation to the concerned individual.
8. Review how the original concern was brought to the NRC's attention.
9. Working with your supervisor, simulate receiving an allegation and complete the required documentation to have the concern presented at an ARB meeting. Discuss with your supervisor a proposed inspection/review of the simulated allegation.
10. Discuss with your supervisor the options available to the NRC to follow up on an allegation and the circumstances when each is appropriate.
11. Obtain the inspection results and/or licensee review information for a concern that has been referred. Discuss the precautions and limitations associated with referrals with your supervisor or the Allegation Coordinator.
12. Compare the inspection results or licensee investigation results to the original concern. Discuss with your supervisor how the inspection results addressed the concerns.
13. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-5

## Basic-level Individual Study Activity

**TOPIC:** (ISA-6) NRC's Response to an Emergency at a Nuclear Facility

**PURPOSE:** The purpose of this activity is to acquaint you with the actions taken by the NRC in response to an emergency that may occur at a nuclear facility. Emergency response is vital to the agency, fulfilling one of its primary mandates—protecting the health and safety of the public. As a fully qualified inspector, you will be trained to perform specific emergency response activities. This individual study activity will help you understand how the NRC meets its emergency response mandate and will begin to build the knowledge you will need later to successfully perform your assigned emergency response responsibilities.

**COMPETENCY AREA:** EMERGENCY RESPONSE

**LEVEL OF EFFORT:** 6 hours

**REFERENCES:** MD 8.2, "NRC Incident Response Program"

Regional Policy Guide for Emergency Response

NUREG-0728, "NRC Incident Response Plan" (Note: This NUREG is revised periodically to reflect changes to the agency's activities. Be sure to obtain the most recent version)

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the role of the agency and your region or office in protecting public health and safety when responding to emergency situations at a nuclear facility by successfully addressing the following:

1. Identify the types of emergency classifications and give examples of when the different classifications would be declared.
2. Recognizing that these positions may not apply to all nuclear facilities and that the NRC will act with all available resources to respond to an emergency, identify the responsibilities of the following during a declared emergency in a site under construction:
  - a. Construction Resident Inspector.
  - b. Region-based Construction Inspector in the field.
  - c. Construction Inspector in a facility under construction adjacent to an operating reactor site.

**TASKS:**

1. Review your region or office's policy guidance on emergency response.
2. Review the NRC Incident Response Plan in order to address the evaluation criteria. Go to Emergency Response on the NRC external Web site and "tour" the Operations Center.
3. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

**DOCUMENTATION:**

Basic-Level Certification Signature Card Item ISA-6

## Basic-level Individual Study Activity

**TOPIC:** (ISA-7) Enforcement Program

**PURPOSE:** The purpose of this activity is to provide you with an overview of the NRC's enforcement program. This individual study activity will assist you in learning and understanding: (1) the purpose of the enforcement program, (2) the sanctions used in the enforcement program, and (3) the methods used in assessing and dispositioning violations. It will also provide you with an understanding of the information and guidance resources available to the staff on the enforcement program.

***Note: This study is intended to be a general overview. Construction specific enforcement information will be provided later in the Construction Inspector Qualification Program.***

### COMPETENCY

**AREA:** REGULATORY FRAMEWORK  
ENFORCEMENT

### LEVEL OF

**EFFORT:** 16 hours

**REFERENCES:** Enforcement-related information included on the Enforcement page of the NRC's public web site, including, the NRC Enforcement Policy, the Enforcement Manual, the Enforcement Program Overview, and the Enforcement Process Diagram

Regional Policy Guide for Enforcement

### EVALUATION

**CRITERIA:** Upon completion of the tasks in this activity, demonstrate your understanding of the Agency's enforcement program by successfully completing the following items:

1. State the purpose of the NRC's Enforcement Policy.
2. Describe the legal basis from which the NRC derives its enforcement authority.
3. Identify the burden of proof standard that the NRC uses in enforcement proceedings.

4. Identify the primary sanctions the NRC uses in the enforcement program.
5. State the four issues the NRC considers to assess the significance of a violation.
6. Describe the two types of significance categorization outcomes.
7. Define a minor violation and state the policy on documenting and correcting these violations.
8. Define Non-Cited Violation (NCV).
9. Define escalated enforcement action.
10. Review the Enforcement Policy supplement for construction (violation examples).
11. Understand how to use the Enforcement Process Diagram to disposition violations.
12. Describe what pre-decisional enforcement conferences and regulatory conferences are; and why, when, and with whom they are conducted.
13. Discuss the purpose of civil penalties, when the NRC considers issuing them, and how the NRC determines the amount of penalties.
14. Recognize the purpose and different types of Orders and when they are used.

**TASKS:**

1. Locate the Enforcement web page on the NRC's public web site. (Hint: look under Public Meetings and Involvement).
2. Read the Enforcement Program Overview included on the Enforcement page.
3. Read the Enforcement Process Diagram on the Enforcement page of the NRC's public web site.
4. Locate the Enforcement Manual on the Enforcement page of the NRC's public web site (look under Enforcement Guidance) and review the table of contents and appendices.
5. Read the memorandum from the Director, Office of Enforcement, dated December 5, 2000, titled, "Dispositioning of Enforcement



Issues in a Risk-Informed Framework” (ADAMS accession number ML003777558).

6. Locate the most recent escalated enforcement action on the Enforcement page of the NRC’s public web site and review the transmittal letter and attached Notice of Violation.
7. Review Regional Office guidance on implementing the Enforcement Policy.
8. Meet with the enforcement specialist in your Region or Office to discuss the current enforcement guidance.
9. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA- 7

## Basic-level Individual Study Activity

**TOPIC:** (ISA-8) The Office of Investigations

**PURPOSE:** The purpose of this activity is to familiarize you with the Office of Investigations (OI). As a fully qualified inspector you may be assigned to work with the Office of Investigations by providing technical support. This individual study activity will help you to understand the role of the Office of Investigations, how it functions, and what your responsibilities will be if you are assigned to assist OI during the conduct of an investigation.

**COMPETENCY AREA:** INSPECTION  
REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 4 hours

**REFERENCES:** MD 9.8, "Organization and Functions, Office of Investigations"  
  
Regional or Office of Investigations Director  
  
Office of Investigations Website on the NRC External Website

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the purpose and function of the Office of Investigations (OI) by successfully addressing the following:

1. State the function of OI.
2. Describe the organizational structure of OI.
3. Describe what your role would be in assisting OI.
4. Describe the authorities of an OI investigator.

**TASKS:**

1. Review Management Directive 9.8.
2. Study the Office of Investigations Web page and associated organizational charts.
3. Meet with an experienced OI criminal investigator and discuss two materials/reactors cases investigated by OI, one substantiated and one not substantiated.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-8

## Basic-level Individual Study Activity

**TOPIC:** (ISA-9) The Construction Inspection Program

**PURPOSE:** The purpose of this study activity is for you to obtain a broad overall knowledge of the construction inspection program for new reactors. Upon completion of this study activity, you will have the necessary background to go into a more detailed study of the construction inspection program, and learn the specifics of what an inspector does, why it is done, and how it is done. **You will also obtain a broad overall knowledge of the guidance provided to inspectors (1) for verifying that ITAAC-related activities are performed successfully and (2) to support the Commission's determination, in accordance with 10 CFR 52.103(g), that the acceptance criteria in the combined license have been met.**

**COMPETENCY AREA:** INSPECTION  
REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 40 hours

**REFERENCES:** 10 CFR Part 52, "**Licenses** Certifications **and Approvals** For Nuclear Power Plants"

NUREG/BR-0298, "Nuclear Power Plant Licensing Process," Rev.2

NRC Inspection Manual Chapter (IMC) 2501, "Early Site Permits"

IMC 2502, "**Pre-Combined License (Pre-COL) Phase**"

IMC 2503, "Construction Inspection Program - ITAAC"

IMC 2504, "Construction Inspection Program - Non-ITAAC"

IMC 2505, "Periodic Assessment of Construction Inspection Program Results"

IMC 0613, "**Documenting 10 CFR Part 52 Construction and Test Inspections**"

**10 CFR Part 70.4 "Domestic Licensing of Special Nuclear Material, Definitions"**

**10 CFR Part 70.23 (b) "Domestic Licensing of Special Nuclear Material, Requirements for the approval of applications"**

## EVALUATION CRITERIA:

After completing this study activity, you will demonstrate your understanding of the reactor construction inspection program by successfully doing the following:

1. Explain when the NRC starts implementing the construction inspection program at a site, and how long it remains in effect.
2. Identify the major program elements of the reactor construction inspection program and their specific functions.
3. Explain ITAAC and what process is used to verify ITAAC completion in accordance with 10 CFR 52.99.
4. Define the relationship between ITAAC and non-ITAAC inspection items.
5. Describe the purpose of the NRC periodic assessments of the Reactor Construction Program.
6. State the purpose and content of inspection reports.
7. Describe the purpose of the Design Control Document and how it is related to successfully verifying ITAAC completion.
8. Explain how verification that ITAAC-related activities have been completed successfully is critical to issuance of the 10 CFR 52.103(g) finding.
9. Describe how ITAAC-related issues are documented in an inspection report.
10. Define Items Relied on for Safety (IROFS) for fuel facilities and Principal Structures, Systems and Components (PSSC) of a plutonium processing and fuel fabrication plant.

***Note: All inspection documents identified below can be obtained from the Electronic Reading Room on the NRC's web site.***

## TASKS:

1. Locate Inspection Manual Chapter (IMC) 2501, "Early Site Permits," IMC 2502, "Pre-Combined License (Pre-COL) Phase", IMC 2503, "Construction Inspection Program - ITAAC," IMC 2504, "Construction Inspection Program – Non-ITAAC." Read the appropriate IMCs in detail and scan the appendices to

become aware of the organization of the construction inspection program including its major parts.

2. Locate NUREG/BR-0298, "Nuclear Power Plant Licensing Process," Rev. 2. Read the NUREG to become aware of the concept of the reactor licensing process, its parts, and how it is implemented through the IMCs.
3. Locate IMC 2505, "Periodic Assessment of Construction Inspection Program Results." Scan the manual chapter to obtain a broad understanding of how the NRC assesses licensee performance and the actions the NRC takes for varying levels of licensee performance.
4. Locate IMC 0613, "**Documenting 10 CFR Part 52 Construction and Test Inspections**" and read the manual chapter to obtain a general understanding of the objectives of a construction inspection report, become familiar with the terminology and definitions, the format of an inspection report, and have a general understanding of how inspection "findings" are addressed.
5. **Locate a design control document (e.g.AP1000) and review the contents to obtain a general understanding of how to use the document and how it supports ITAAC inspections.**
6. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-9

## Basic-level Individual Study Activity

**TOPIC:** (ISA-10) Understanding How the Commission Operates

**PURPOSE:** The NRC commissioners establish the approach the NRC staff will use to address a particular need of agency importance. Examples include the commission policy statement regarding NRC staff use of Probabilistic Risk Analysis in the decision-making process and resident inspector staffing requirements at power reactor facilities. Commission decisions can have a significant impact on the conduct of inspection activities. Inspectors should be familiar with the direction-setting and policy-making activities of the Commission.

**COMPETENCY AREA:** REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 4 Hours

**REFERENCES:** NRC External Websites

**EVALUATION CRITERIA:** At the completion of this activity, you should be able to:

1. Locate commission-related documents on the internal and external agency web page.
2. Discuss how staff requirements memoranda are used by the commission to direct the staff.

**TASKS:**

1. Read about the Commission's "Direction-setting and Policy-making" activities under the heading of "What We Do."
2. Read about the different kinds of decision documents issued by the Commission.
3. Find and read Chairman Meserve's speech given on 12/11/2001 about "NRC Programs and Processes for Safety Oversight."
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-10

## Basic-level Individual Study Activity

**TOPIC:** (ISA-11) Organization and Content of the NRC Inspection Manual

**PURPOSE:** The purpose of this activity is to introduce you to the contents and organization of the NRC Inspection Manual, and to how those contents relate to inspection programs, particularly the reactor construction inspection program. As an inspector, you will be implementing an inspection program that is defined by manual chapters and implemented by their associated inspection procedures. This study activity will help you to identify and locate inspection procedures that are used in the construction inspection program and to recognize the limitations associated with applying the guidance contained in the procedures. This activity will also introduce you to manual chapters that establish policy which will govern some of your actions in implementing the inspection program.

**COMPETENCY AREA:** REGULATORY FRAMEWORK  
INSPECTION

**LEVEL OF EFFORT:** 8 hours

**REFERENCES:** NRC Internal Home Page - Program Offices - NRR and NRO

Inspection Manual Chapter 0040, "Preparing, Revising and Issuing Documents For the NRC Inspection Manual"

Inspection Manual

**EVALUATION CRITERIA:** After completing this activity you will demonstrate your understanding of the content and organization of the NRC Inspection Manual, and the limitations associated with applying the guidance contained in the manual by successfully doing the following:

1. Identify the major parts of the NRC Inspection Manual.
2. State the purpose of each of the following types of documents located in the NRC Inspection Manual:
  - a. Manual Chapters.
  - b. Inspection Procedures.
  - c. Temporary Instructions.
  - d. Technical Guidance.
  - e. 10 CFR Guidance



- f. Table of Contents
- g. Change Notices

3. Describe the numbering/identification process used for the items in No. 2 above.
4. Demonstrate the ability to locate copies of inspection documents contained in the NRC Inspection Manual on the Web.

#### **TASKS:**

1. Locate Inspection Manual Chapter 0040, "Preparing, Revising and Issuing Documents For **the** NRC Inspection Manual" from the Electronic Reading Room on the NRC External Web site.
2. Read in detail the first six sections of **IMC** 0040, and scan the remainder portions of the document.
3. Locate the Table of Contents for the "NRC Inspection Manual."
4. Scan the Table of Contents, noticing in particular the following:
  - a. The date of issuance and latest change notice entered in the Table of Contents.
  - b. Title associated with Part numbers.
  - c. The number associated with each document.
  - d. The issue date and change notice number associated with each document.
5. Locate the section of the NRC inspection manual entitled "Technical Guidance". Scan the titles of the individual guidance documents.
6. Read the inspection procedures that apply to your inspector area.
7. Meet with your supervisor, or an experienced inspector, and discuss the technical guidance contained in **the Technical Guidance section of the Inspection Manual.** Discuss the limitations that are associated with applying the guidance contained in the inspection procedures.
8. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-11

## Basic-level Individual Study Activity

**TOPIC:** (ISA-12) NRC Interagency Agreements

**PURPOSE:** While conducting reactor inspection activities, inspectors may identify important issues that could adversely affect health and safety but are not under the direct regulatory authority of the NRC. Examples include industrial safety items, such as loose asbestos insulation, and other issues, such as defective radioactive waste shipping trailers. Conversely, other federal and state agencies may identify issues of concern to the NRC. To ensure these items are addressed by the proper regulatory authority, the NRC has established agreements, called memoranda of understanding, with other federal and state agencies which outline how these issues should be addressed.

This activity will introduce you to the major interagency agreements that the NRC has entered into and familiarize you with the regional or office points-of-contact that have been established for other federal and state agencies.

**COMPETENCY  
AREA:**

REGULATORY FRAMEWORK

**LEVEL OF  
EFFORT:**

4 Hours

**REFERENCES:** **Inspection** Manual Chapter 1007, "Interfacing Activities Between Regional Offices of NRC and OSHA"

NRC Internal Website, Enforcement Guidance

Regional or Office **G**uidance

**NRC R1 internal website - DNMS Training Handouts - Archive - presentation on Memorandums of Understanding (MOUs)**

**EVALUATION  
CRITERIA:**

At the completion of this activity, you should be able to:

1. Locate the active memoranda of understanding (MOU) used to coordinate between the NRC and other federal agencies or state agencies.
2. Explain, in general terms, how the NRC coordinates with state and other federal agencies on matters that are not under the regulatory authority of the NRC.

3. Explain the actions required by an NRC inspector when he/she identifies an occupational health and safety issue at a construction facility. Be able to state where the guidance for these actions is provided.
4. Identify who, in your Region or Office, is the point of contact for coordinating NRC activities with the following federal agencies:
  - a. Occupational Safety and Health Administration (OSHA).
  - b. Department of Transportation (DOT).
  - c. Federal Emergency Management Administration (FEMA).
  - d. Department of Energy (DOE).
  - e. State Agencies.

**TASKS:**

1. Identify where the current NRC MOUs are available in your Region or Office. Electronic versions can be found on the NRC Internal Web site under Enforcement.
2. Review the MOUs to develop a general understanding of the agreements between the NRC and the following federal agencies: OSHA, DOT, FEMA, and DOE. For Regional inspectors, review any MOUs between the NRC and the states in your regions. Determine the major services or resources available to be coordinated between the NRC and these agencies.
3. Identify the designated liaison for those agencies and state agencies in your Region or Office.
4. Meet with your supervisor, an experienced inspector, or the above liaison representative, and discuss issues that involve interface with other federal agencies or state agencies. Discuss how issues are addressed in the context of the applicable NRC MOU and office guidance.
5. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-12

## Basic-level Individual Study Activity

**TOPIC:** (ISA-13) Interaction with the **Media and the Public**

**PURPOSE:** The purpose of this activity is to provide you with an understanding of the importance of communicating with the public and media in an accurate, clear, and non-complex manner and within the limitations of agency guidance for the release of information to the public. This supports one of the NRC's main objectives of increasing public confidence. This study activity will provide you information on the implementation of the guidance on contacts with the public and media.

**COMPETENCY AREAS:** COMMUNICATION  
SELF-MANAGEMENT  
REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 6 hours

**REFERENCES:** NUREG/BR 0215, "Public Involvement in the Nuclear Regulatory Process" Rev. 2

NUREG/BR-0297, "NRC Public Meetings"

NRC Management Directive (MD) 3.4, "Release of Information to the Public"

MD 3.5, "Public Attendance at Certain Meetings Involving the NRC Staff"

NRC **External** Web site, Public Meetings **& Involvement**

NUREG/BR-0318, "Effective Risk Communication"

Regional or Office guidance related to interaction with the public (Conduct of public meetings, Response to inquiries from the public, Release of Information to the **Public) and the media.**

**NUREG/BR-0202, "Guidelines for Interviews with the News Media"**

**NUREG/BR-0224, "Guidelines for Conducting Public Meetings"**

**EVALUATION CRITERIA:** Upon completion of this activity, you **should be able to:**

1. Discuss the NRC goal of improving public confidence and how good communication with the media contributes to achieving that goal.
2. Identify the importance of communicating with the media in a manner to build trust.
3. Discuss the importance of the following with regard to communication with the media: agency goals, onsite inspection staff, safety focus, risk informed, trustworthy and limited knowledge on the subject.
4. Discuss the importance of planning ahead and preparing well for communication with the media.
5. Name some resources available to you to assist you in responding to the following types of **public** inquiries:
  - a. General questions about NRC organization and functions
  - b. General questions about a technical topic such as radioactive particles
  - c. Questions about a licensed facility's performance or an NRC inspection
  - d. Questions on a specific technical issue of current interest
6. Discuss the importance of controlling your speech, including what words to not use, not speculating, not guessing, not answering the "what if" questions, not giving your opinion or repeating any other person's opinion, and not talking off the record. Describe the restrictions regarding the release of information to the public including specific types of information that are not to be released.
7. Describe the policy and process for how to communicate to management any inquiries from or unplanned interactions with the news media and other members of the public. Describe the expectations of NRC employees regarding answering telephone calls that involve inquiries from a member of the public.
8. Describe what is meant by "Plain Language". Identify where examples and guidance related to plain language can be found.
9. Describe how other public inquiries, including "non-allegations", are handled in your office.
10. Describe what an NRC employee should do if he/she is requested to speak (on an NRC-related topic) at a meeting such

as the Lions Club or local chapter of the American Nuclear Society.

11. Identify what types of NRC meetings are generally open to the public. List some that are not usually open to the public.
12. Describe how members of the public can find out about NRC public meetings. Discuss the expectations on timeliness of meeting notices and summaries.
13. Describe how to effectively communicate risk when answering questions from the public and news media.

***Note: NUREG references in this activity that can not be found on the NRC's external web site may be requested from your Public Affairs Officer***

**TASKS:**

1. Meet with the regional Public Affairs Officer or someone from Office of Public Affairs at Headquarters to discuss the guidelines for interviews with the news media and interactions with the public.
2. Explore all aspects of the importance of appropriate, accurate, and clear communications with the public provided on the NRC's Web Site.
3. Review the agency guidance on how to communicate with the public - media.
4. Visit the NRC's Plain Language Action Plan on the internal web site, including some of the links to resource materials.
5. Identify, locate, and review your region's policy guidance on staff's receipt and processing of inquiries from the general public. Meet with your PAO or supervisor and discuss the expectations of an inspector who receives an inquiry.
6. Meet with your supervisor and discuss the types of public and media interactions that you are likely to encounter and ensure that you understand what you are to do. Then, discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-13

## Basic-level Individual Study Activity

**TOPIC:** (ISA-14) Institute of Nuclear Power Operations (INPO) and Nuclear Energy Institute (NEI)

**PURPOSE:** The purpose of this activity is to familiarize you with the appropriate protocols when reviewing documentation generated by the Institute of Nuclear Power Operations (INPO) and the Nuclear Energy Institute (NEI).

**COMPETENCY AREAS:** REGULATORY FRAMEWORK  
SELF-MANAGEMENT

**LEVEL OF EFFORT:** 1 hour

**REFERENCES:** NUREG/BR-0075, "NRC Field Policy Manual" (available on the NRC internal Web site under Agencywide Applications-**Policy**)

IMC 0613, "**Documenting 10 CFR Part 52 Construction and Test Inspections**"

**EVALUATION CRITERIA:** Upon completion of the tasks in this activity, you will be asked to demonstrate your general understanding of the appropriate protocols and conduct when reviewing INPO and NEI documentation and when conducting an inspection when INPO or NEI are at a facility by discussing the following:

1. Specify when it is appropriate to refer to INPO documents in an NRC inspection report or other agency documentation.
2. Identify the circumstances under which you are allowed to perform an inspection of an NEI initiative.
3. Identify the accepted protocol for an NRC inspector attending an INPO meeting held with licensee personnel.

**TASKS:**

1. Review NUREG/BR-0075, "Field Policy Manual, No. 9, NRC Review of INPO Documents."
2. Review NUREG/BR-0075, "Field Policy Manual, No. 12, Coordination of NRC Activities at Power Reactor Facilities."
3. Review NUREG/BR-0075, "Field Policy Manual, No. 14, NRC Interaction with the Nuclear Energy Institute."

4. Review IMC 0613 for the protocol for documenting third-party reviews.
5. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

**DOCUMENTATION:** Basic-Level Certification Signature Card Item ISA-14



## Basic-level Individual Study Activity

**TOPIC:** (ISA-15) Freedom of Information Act and the Privacy Act

**PURPOSE:** The purpose of this activity is to provide you with an understanding of how the NRC implements the Freedom of Information Act (FOIA) and the Privacy Act while guarding against the inadvertent and unauthorized release of information. While it is very important to communicate with the public, communication must be done within the limitations of agency guidance for the release of information to the public. This supports one of the NRC's main objectives of increasing public confidence. This study activity will provide you information on the implementation of the guidance on responding to FOIA requests for information from the public.

**COMPETENCY AREAS:** COMMUNICATION  
SELF-MANAGEMENT  
REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 6 hours

**REFERENCES:** 10 CFR Part 9, "Public Records"

Management Directive 3.1, "Freedom of Information Act"

Management Directive 3.2, "Privacy Act"

Management Directive 3.4, "Release of Information to the Public"

Regional or Office Instructions establishing the policy and procedure for processing FOIA requests for agency records

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the guidance on contacts with the media by successfully addressing the following:

1. Discuss the NRC goal of improving public confidence and how implementing the provisions of FOIA and the Privacy Act will contribute to achieving that goal.
2. Identify the completeness and timeliness requirements for responding to an FOIA request and discuss how important this responsiveness is in building public trust.

3. Discuss the following responsibilities when responding to a FOIA request:
  - a. provide all records subject to the request in the Agency's possession;
  - b. identify other NRC offices that might have records subject to the FOIA request;
  - c. screen the records prior to release to ensure that withholdable information is properly marked prior to forwarding to Headquarters; and
  - d. support the decision to withhold information by providing the appropriate exemption and "foreseeable harm" statements.
4. Identify the type of information which should be withheld from release when responding to an FOIA request, including the proprietary, pre-decisional, and privacy information.
5. Describe the legal limitations of what can be released to the public and what must be protected under the Privacy Act.
6. Describe the policy and procedure for processing FOIA requests for agency records.

**TASKS:**

1. Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.
2. Explore the information made available to the public on the NRC's Web Site and via ADAMS.
3. Review the agency guidance on how to implement the FOIA without releasing pre-decisional information and other information covered under the Privacy Act.
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-15

## Basic-level Individual Study Activity

**TOPIC:** (ISA-16) Entrance and Exit Meetings

**PURPOSE:** Effective communication is critical for overall Agency success. For NRC inspectors, the inspection entrance and exit meetings are the primary forums for communicating issues with licensees. In addition to communicating effectively, as government officials, inspectors have additional requirements to follow during entrance and exit meetings to ensure proprietary data and safeguard information is not disclosed, and information is shared with the public when appropriate. To ensure issues are discussed in accordance with NRC requirements, communication standards have been established that outline how entrance and exit meetings are to be conducted. The purpose of this activity is to introduce you to the standards for conducting NRC entrance and exit meetings and to allow you to demonstrate an ability to conduct an entrance and exit meeting.

**COMPETENCY AREA:** COMMUNICATION  
TEAMWORK  
INSPECTION

**LEVEL OF EFFORT:** 6 Hours

**REFERENCES:** **Inspection** Manual Chapter 2500, "Reactor Construction Inspection Program" (under development)

Regional Guidance or Office Guidance (as applicable)

**EVALUATION CRITERIA:** At the completion of this activity, you should be able to:

1. Locate the various guidance for conducting NRC entrance and exit meetings.
2. Successfully conduct an entrance and exit meeting in accordance with NRC guidance.

**TASKS:**

1. Locate and read the guidance for conducting NRC entrance and exit meetings contained in **IMC** 2500 and regional or office instructions.
2. Observe at least one entrance and exit meeting conducted at a site. If possible, observe meetings that have been conducted for

a wide range of inspection activities in a variety of forums, such as a public exit meeting.

3. Review an inspection report that was recently completed, and conduct a “mock” entrance and exit meeting of the inspection report findings in the presence of your supervisor or a fully qualified inspector designated by your supervisor.
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-16

## Basic-level Individual Study Activity

**TOPIC:** (ISA-17) Documenting Inspection Findings

**PURPOSE:** NRC inspection reports serve many important functions. In addition to serving as a vehicle to communicate inspection findings to a licensee, inspection reports form part of the historical record of NRC activities at a reactor site. To that end, it is vital for inspection reports to clearly document the results of inspection activities conducted. To assist inspectors in the preparation of inspection reports, the NRC has developed several guidance documents, which outline what information should be documented in an inspection report, and how that information should be presented. The purpose of this activity is to introduce you to the standards for preparing NRC inspection reports and to allow you to demonstrate an understanding of the applicable inspection report documentation requirements and to develop a working knowledge of the inspection documentation process.

**COMPETENCY AREAS:** INSPECTION  
SELF-MANAGEMENT  
COMMUNICATION  
TEAMWORK  
ASSESSMENT AND ENFORCEMENT

**LEVEL OF EFFORT:** 16 Hours

**REFERENCES:** NRC Inspection Manual 0613, "Documenting 10 CFR Part 52  
"Construction and Test Inspections"

Inspection Manual Chapter 0616, "Fuel Cycle Safety and  
Safeguards Inspection Reports"

NRC Inspection Manual 0620, "Inspection Documents and Records"

"Plain Language Initiative" web site, which has NUREG-1379 for editorial style guidance, the directives from the President of the US, and other related documents,  
[www.internal.nrc.gov/NRC/PLAIN/index.html](http://www.internal.nrc.gov/NRC/PLAIN/index.html)

Regional Guidance or Office Guidance (as applicable)

**EVALUATION CRITERIA:** At the completion of this activity, you should be able to:

1. Locate the various guidance for preparing NRC inspection reports.
2. Describe the documentation process for inspection scope, observations, input for ITAACs, and findings to assure that inspection results will be retrievable for use in the construction closeout and ITAAC verification process.
3. Verify an inspection report was written in accordance with the applicable NRC guidance.
4. Explain the threshold and categories for documenting licensee and NRC identified issues in NRC inspection reports.
5. Explain how CIPIMS and the construction inspection documentation process assure that inspection activities, observations, and findings are properly documented.
6. Explain how inspection activities, when properly documented, provide the basis for verifying that the ITAACs have been met.

#### **TASKS:**

1. Locate and read the various guidance for documenting inspection findings. The necessary information will be contained in NRC manual chapters, and regional or office instructions.
2. Select a recently completed inspection report that was prepared in your region or office that contains both NRC and licensee identified findings. Compare the inspection report format and content to the report preparation guidance contained in NRC **IMC 0613 or IMC 0616 depending on the inspection site**, and to any applicable regional or office guidance. Through review of the guidance, and conversations with the report author, verify the report was prepared in accordance with the requisite report preparation guidance.
3. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-**17**

## Basic-level Individual Study Activity

**TOPIC:** (ISA-18) The NRC Differing Professional Opinions (DPO) Program

**PURPOSE:** The purpose of this activity is to provide guidance on the informal and formal processes for pursuing resolution of differing professional views or opinions. It is the policy of the NRC and the responsibility of all NRC supervisory and managerial personnel to maintain a working environment that encourages each employee to make known his/her best professional judgment even though that judgment may differ from the prevailing staff view, disagree with a management decision or policy position or take issue with proposed or established agency practices. To further this policy, NRC Management Directive (MD) 10.159, "The NRC Differing Professional Opinions Program" establishes an informal process to foster discussions with peers and supervisors on issues involving professional judgments that may differ and a formal process to be used when expressing differing professional opinions. This activity will provide you with an understanding of NRC's Differing Professional Opinions (DPO) Program.

**COMPETENCY AREAS:** INSPECTION  
SELF-MANAGEMENT  
COMMUNICATION

**LEVEL OF EFFORT:** 2 hours

**REFERENCES:** Management Directive (MD) 10.159, "The NRC Differing Professional Opinions Program"

Regional or Office Instructions establishing the policy and procedure for resolving DPOs (if applicable)

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's Differing Professional Opinions Program by successfully addressing the following:

1. State the purpose of the NRC's DPO process.
2. Describe the Agency's DPO Program and how it is implemented.
3. State the expectations of NRC employees regarding making known their best professional judgment even though it may differ from the judgment of others.

4. Discuss under what circumstances the various methods available for expressing your best professional judgment would be used.

5. Describe where the resolution DPOs are published.

**TASKS:**

1. Meet with the regional counsel, or other individual designated to be your resource for this activity, to develop an understanding of the NRC policy and guidance for resolution of differing professional opinions.

2. Review the Agency's Management Directive (MD) 10.159, "The NRC Differing Professional Opinions Program."

3. Explore all aspects of the Agency's DPO guidance and documentation provided on the NRC's Web Site.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-18



### Basic Level Individual Study Activity

<b>TOPIC:</b>	(ISA-19) Overview of 10 CFR Part 50 Appendix B
<b>PURPOSE:</b>	This activity will provide you with a working knowledge of the contents of 10 CFR Part 50, Appendix B, the industry standard, and the associated licensee program and documents which collectively establish the basis for the licensee's quality assurance (QA) program.
<b>COMPETENCY AREA:</b>	INSPECTION
<b>LEVEL OF EFFORT:</b>	4 Hours
<b>REFERENCES:</b>	10 CFR, Part 50, Appendix B  ASME NQA-1-1994, "Quality Assurance Program Requirements for Nuclear Power Plants"  Licensee Quality Assurance Program
<b>EVALUATION CRITERIA:</b>	At the completion of this activity, you should be able to:  <ol style="list-style-type: none"><li>1. Discuss the eighteen criteria contained in Appendix B to 10 CFR Part 50 and the content of ASME NQA-1.</li></ol>
<b>TASKS:</b>	<ol style="list-style-type: none"><li>1. Review and discuss the eighteen criteria of Appendix B with your supervisor, or qualified inspector, and communicate an understanding of their content and general application to field inspections.</li><li>2. Review a licensee QA program and the associated implementing procedures.</li><li>3. Meet with your supervisor or a qualified inspector to discuss any questions that you may have as a result of this activity and demonstrate that you can meet the evaluation criteria listed above.</li></ol>
<b>DOCUMENTATION:</b>	Basic-level Certification Signature Card Item ISA-19

## Basic-level Individual Study Activity

**TOPIC:** (ISA-20) Overview of 10 CFR Part 21

**PURPOSE:** The purpose of this activity is to familiarize you with Part 21 of the NRC regulations. These regulations are generic to any firm manufacturing or supplying components for a nuclear facility and require notification to the NRC of defects. This individual study activity will help you understand the purpose of Part 21 and provide you with some basic knowledge that all NRC inspectors will use when conducting construction inspections.

**COMPETENCY AREA:** REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 4 hours

**REFERENCES:** NRC Internal web page - NRC Maintained 10 CFR Website - Part 21  
A hard copy of Part 21

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your general understanding of Part 21 and why these regulations are important for all inspectors, by successfully addressing the following:

1. Describe the general purpose of Part 21.
2. Identify the process that results in reasonable assurance that commercial grade items can be utilized and will perform their intended safety function.
3. Identify what Part 21 requires to be reported.
4. Discuss why it is important for every NRC inspector to have a general understanding of Part 21.

**TASKS:**

1. Review Part 21 for a general understanding of the following:
  - a. The purpose of Part 21 [21.1]
  - b. The meaning of commercial grade item dedication [21.3]
  - c. The relationship of Part 21 to Part 50.55(e) [21.2(b)]
  - d. Documents that are required to be posted [21.6]
  - e. Requirements for reporting defects [21.21(d)(4)]

2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA-20

## Basic-level Individual Study Activity

**TOPIC:** (ISA-21) Licensee-specific Regulatory Documents and Procedures

**PURPOSE:** The purpose of this activity is to acquaint you with licensee-specific documents and procedures that you need to be aware of and be able to access on-site during an inspection. These documents and procedures describe how a licensee complies with NRC regulations and requirements. As a fully qualified inspector you will need to identify circumstances where the licensee is in non-compliance. Also, inspectors must adhere to applicable licensee procedures at all times while on-site. This activity will acquaint you with the most common types of licensee-specific regulatory documents and procedures and will help you learn how individual facilities may implement NRC regulations and requirements differently.

**COMPETENCY AREA:** REGULATORY FRAMEWORK

**LEVEL OF EFFORT:** 16 hours

**REFERENCES:** Final Safety Analysis Report (FSAR) (any available)

Facility-specific COL application (any available)

NUREG 800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants"

NUREG-1520 "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility"

Facility-specific Safety Evaluation Report (SER) (any available)

IMC 0613 "Documenting 10 CFR Part 52 Construction and Test Inspections"

IMC 0616 "Fuel Cycle Safety and Safeguards Inspection Reports"

Enforcement Manual

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your familiarity with the role of licensee-specific regulatory documents and procedures within the regulatory framework by successfully addressing the following:

1. The purpose and content of a facility-specific COL application, FSAR and SER.
2. The purpose and content of a fuel facility-specific application, FSAR and SER.
3. The purpose of NUREG 0800 and how it is related to the documents identified in item 1.
4. The purpose of NUREG 1520 and how it is related to the documents identified in item 2.
5. The applicability of enforcement actions related to findings associated with an FSAR or SER.

**TASKS:**

1. Review a facility-specific COL application, FSAR and SER.
2. Review NUREG 800 and NUREG 1520 and recognize how the NRC standard review plan is related to the documents identified in items 1 and 2.
3. Review IMC 0613, IMC 0616 and the Enforcement Manual and understand how findings related to the FSAR, COL application and SER are to be treated.
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Certification Signature Card Item ISA- 21

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**Basic Level Rotation and On-the-Job Activities**

## Basic-Level **Rotation and On-the-Job Training Activities**

The on-the-job activities require you to conduct inspection-related work, under supervision, at a **fuel facility under construction, at a** reactor construction facility or at an operating plant undergoing major modifications where construction activities are ongoing. They are designed to allow you to observe and perform key inspector tasks under controlled circumstances. Like the individual study activities, each on-the-job **training activity and the rotation** informs you why the activity is important, how much time you might need to complete the assignment, and what you are expected to complete successfully during the activity.

Prior to beginning the activities in this section, you must successfully complete the course work for site access, if applicable. There are two ways this can be done. You can complete the NRC's Site Access Course and the site specific requirements for access. Or, you may complete the site access requirements at a site. Your supervisor will discuss with you the best way for you to meet the site access requirements, if required.

**The following general guidance applies as you complete the various on-the-job activities:**

- The activities in this section should be completed in the order in which they are presented.
- Complete all parts of each activity.
- Your supervisor will act as a resource as you complete each activity. Discuss any questions you may have about how a task must be done or how the guidance is applied. Your supervisor may also designate other fully qualified inspectors to work with you as you complete the various activities.
- You are responsible for keeping track of what tasks you have completed. Be sure that you have completed all aspects of **the rotation or the** OJT activity before you meet with your supervisor for evaluation.



## Basic-level Rotation

**TOPIC:** (ROT-1) Construction Site

**PURPOSE:** The purpose of this activity is for you to gain understanding of the licensee's construction organization, the applicable licensing documents, the licensee's quality assurance program, and the inspection process.

**COMPETENCY AREAS:** INSPECTION  
COMMUNICATION  
FUNDAMENTAL PLANT DESIGN AND CONSTRUCTION

**LEVEL OF EFFORT:** Minimum 2 weeks

**REFERENCES:** Licensee's drawing(s) of the site building layouts.

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of the general plant layout and inspector behavior at the site by successfully addressing the following:

1. Given a drawing of the site building layout, be able to identify where the major facility areas are located or are to be located.
2. Review the licensee's construction organization. Identify the functional responsibilities of each department. Identify the major construction contractors.
3. Locate the applicable licensing documents such as the FSAR, SER, License, amendments, Construction Permit. Review applicable sections relevant to your engineering/inspection discipline.
4. Review the licensee's and major contractor's Quality Assurance Program Document. Identify the licensee's implementing procedures. Review a selection of licensee procedures relevant to your engineering/inspection discipline.
5. Review the licensee's corrective action program. Review examples of issues that have been identified and entered into the program.
6. Identify the types of information discussed in the work control meeting – plan of the day meeting that are important to an

inspector and discuss why the information is important.

- TASKS:**
7. Given specific examples, be able to discuss if it is appropriate for an inspector to participate in the discussion at or about the plan of the day Meeting (POD) - work control meeting.
  1. Tour construction and quality assurance oversight activities at approximately a daily frequency.
  2. Locate the licensee's document control center and obtain copies of selected engineering drawings, installation procedures, and other records.
  3. Participate in the inspection planning process. Review the applicable inspection manual chapter and relevant inspection procedures. Prepare an inspection plan for an upcoming activity.
  4. Participate in inspections under the guidance of the resident inspector.
  5. Document inspection results.
  6. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.
- DOCUMENTATION:** Basic-level Certification Signature Card - ROT 1

## Basic-level On-the-Job Activity

**TOPIC:** (OJT-1) Inspection Activities

**PURPOSE:** The purpose of this activity is to familiarize you with inspection tasks commonly performed by an inspector. This on-the-job training will prepare you to independently plan and conduct the baseline inspection program as defined in the applicable Inspection Manual Chapter (IMC).

**COMPETENCY AREAS:**  
INSPECTION  
COMMUNICATION  
TEAMWORK  
SELF-MANAGEMENT

***Note: Completion of this activity should be accomplished at a New Reactor Facility (if possible), but may be accomplished at a Fuel Facility that is under construction or at a vendor manufacturing facility where components of new reactors are being fabricated and assembled.***

**LEVEL OF EFFORT:**

***Note: The objective of this activity is to make sure that you have experienced the full range of inspection activities. The time needed to complete the tasks will depend on your individual proficiency. There is no set number of inspections that you must complete. You must participate in inspections until such time as you can address the evaluation criteria to the satisfaction of your supervisor.***

**REFERENCES:** IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"

IMC 2503, "Construction Inspection Program-Inspection of Inspections, Tests, Analyses and Acceptance Criteria"

IMC 2504, "Construction Inspection Program-Non-ITAAC Inspections"

Applicable Inspection Procedures for activity to be inspected

UFSAR or safety analysis report for activity to be inspected

Inspection planning guidance

**EVALUATION  
CRITERIA:**

Upon completion of this activity, you will be asked to demonstrate your understanding of the construction inspection process by:

1. Describing the contents of a site-specific inspection plan.
2. Describing the purpose of inspection planning.
3. Providing your supervisor with a specific inspection plan that you have prepared. Describe the purpose and contents of a specific inspection plan.
4. Discussing the documents to be reviewed including their content and purpose prior to an inspection.
5. Describing the contents and purpose of the entrance meeting conducted with the licensee.
6. Describing the activities that are accomplished during an inspection, and their purpose.
7. Describing the purpose of the inspection exit meeting with licensee management at the end of an inspection.
8. Describing the purpose of the NRC management post-inspection debrief.

**TASKS:**

- 1 Discuss the site specific inspection plan with the site scheduler and understand where your selected inspection effort fits into the overall plan.
2. Develop a specific inspection plan to implement the applicable inspection procedures.
3. Review the following documents to understand how they provide background information, current issues, areas for emphasis and support for the inspection effort you plan to accomplish:
  - a. Previous inspection reports.
  - b. Appropriate licensee documents such as condition reports and audit results.
  - c. Applicable inspection procedures.
  - d. Other applicable documents such as 50.55(e) and Part 21 Reports.
4. Observe an entrance meeting.

5. Observe the activities performed by a qualified inspector during the completion of the planned inspection by:
  - a. Observing implementation of inspection procedures.
  - b. Observing interviews with facility personnel.
  - c. Observing ongoing work activities.
  - d. Reviewing documentation and records.
  - e. Discussing inspection results with the lead inspector.
6. Observe an exit meeting.
7. Observe an inspection debrief with NRC management.
8. Participate as an active member in an inspection by:
  - a. Drafting a portion of the inspection-specific plan.
  - b. Conducting activities described in No. 5 above as appropriate.
  - c. As deemed appropriate by your supervisor, conducting a portion of:
    - i. the entrance meeting.
    - ii. the briefing of NRC management.
    - iii. the exit meeting.
9. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:** Basic-level Qualification Signature Card- OJT **1**

## Basic-level On-the-Job Activity

**TOPIC:** (OJT-2) Documenting Inspection Findings

**PURPOSE:** The purpose of this activity is to give guidance on content, format, and style for inspection reports. The objectives of this activity are to ensure that inspection reports: 1) clearly communicate significant inspection results to licensees, NRC staff, and the public; 2) provide a basis for significance determination and enforcement action; and 3) present information associated with significant inspection findings in a manner that will be useful to NRC management in developing longer-term, broad assessments of licensee performance.

**COMPETENCY AREAS:** FUNDAMENTAL PLANT DESIGN AND OPERATION  
INSPECTION  
COMMUNICATION  
TEAMWORK  
ASSESSMENT AND ENFORCEMENT

**LEVEL OF EFFORT:** 40 hours

**REFERENCES:** IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"

IMC 0613, "Documenting 10 CFR Part 52 Construction and Test Inspections"

IMC 0616, "Fuel Cycle Safety and Safeguards Inspection Reports"

IMC 0620, "Inspection Documents and Records"

CIPIMS User's Guide

Enforcement Policy (Refer to the NRC web site)

**EVALUATION CRITERIA:** Upon completion of this activity, you will be asked to demonstrate your understanding of documenting inspection findings by successfully addressing the following:

1. Discuss what findings should be documented in an inspection report, including the different types of findings and their thresholds.
2. Describe how to process a finding in CIPIMS.

3. Discuss how to write an inspection report input. including a positive finding.
4. Discuss how to properly handle draft licensee documents.
5. Contrast the differences between inspector identified findings and licensee identified findings and how and why they are treated differently.

**TASKS:**

1. Read the references and focus on the requirements for documenting inspection results.
2. Use IMC 0613 or IMC 0616 to process a finding identified during an inspection or given to you by a qualified inspector.
3. Process a finding through CIPIMS.
4. Using MC 0613 or IMC 0616 and other available guidance, draft an inspection report input containing a positive finding.
5. Given a violation of regulatory requirements and the Enforcement Policy, draft a violation.
6. Using MC 0330 and MC 0620, describe how to determine the documents that must be included as attachments to an inspection report as an agency record.
7. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

**DOCUMENTATION:**

Basic-level Certification Signature Card OJT-2

## Basic-level Signature Card and Certification

<i>Inspector Name:</i> _____	<i>Employee Initials/ Date</i>	<i>Supervisor Initials/Date</i>
<b>A. Training Courses</b>		
Power Plant Engineering (E-110)		
Expectations for Inspectors (G-104)		
Industrial Safety Indoctrination		
Ethics Training, Web-based (Part of ISA-3)		
Allegations Training, Web-based (Part of ISA-5)		
Site Access Training (H-100)		
Reactor Concepts (R-100)		
Information Security (INFOSEC) Awareness Training, Web-based		
<b>B. Individual Study Activities</b>		
ISA-1 History and Organization of the Nuclear Regulatory Commission		
ISA-2 Navigating the NRC's Internal and External Web Pages		
ISA-3 Inspector Objectivity, Protocol, and Professional Conduct		
ISA-4 Fitness for Duty (FFD) Rule		
ISA-5 Allegations		
ISA-6 NRC's Response to an Emergency at a Nuclear Facility		
ISA-7 Enforcement Program		
ISA-8 The Office of Investigations		
ISA-9 The Construction Inspection Program		
ISA10 Understanding How the Commission Operates		
ISA-11 Organization and Content of the NRC Inspection Manual		
ISA-12 NRC Interagency Agreements		
ISA-13 Interaction with the <span style="color: red;">Media and the Public</span>		
ISA-14 Institute of Nuclear Power Operations (INPO) and Nuclear Energy Institute (NEI)		
ISA-15 Freedom of Information Act and the Privacy Act		
ISA-16 Entrance and Exit Meetings		
ISA-17 Documenting Inspection Findings		
ISA-18 The NRC Differing Professional Opinions (DPO) Program		
ISA-19 Overview of 10 CFR Part 50 Appendix B		
ISA-20 Overview of 10 CFR Part 21		
ISA-21 Licensee-specific Regulatory Documents and Procedures		



**C. Rotation and On-the-Job Training Activities**

ROT-1 Construction Site

OJT-1 Inspection Activities

OJT-2 Documenting Inspection Findings

## Basic Construction Inspector Certification

\_\_\_\_\_  
(name)

Has successfully completed all of the requirements  
to be **certified** as a

# BASIC CONSTRUCTION INSPECTOR

Branch Chief Signature: \_\_\_\_\_ Date: \_\_\_\_\_

This signature card and certification must be accompanied by the appropriate Form 1, Basic Level Equivalency Justification, if applicable.

## Form 1: Basic-Level Equivalency Justification

Inspector Name: \_\_\_\_\_

*Identify equivalent training and experience for which the inspector is to be given credit*

### A. Training Courses


### B. Individual Study Activities


### C. On-the-Job Training Activities


Branch Chief's Recommendation

Signature / Date \_\_\_\_\_

Division Director's Approval

Signature / Date \_\_\_\_\_

This form must accompany the Signature Card and Certification, if applicable.

Copies to:      Inspector  
                      HR Office  
                      Branch Chief

# ATTACHMENT 1

## Revision History for IMC 1252 Appendix A

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
	02/06/07 CN 07-005	Initial issue of document	NO	N/A	
N/A	11/25/08 CN 08-033	Revision to update references, address current training policies, and to make minor editorial corrections	NO	N/A	ML081260489
N/A	12/07/09 CN 09-031	Revision to add and update references, add and remove ISAs, add rotation, move some courses to other appendices and to make editorial changes	NO	N/A	ML093000545