Policy, Standards and Quality Assurance

Radioactive Material
Quality Assurance Reviewer

Training PROCEDURE & Qualification JOURNAL

December 2009

Purpose of Training Procedure

The purpose of this procedure is to ensure that each Quality Assurance (QA) Reviewer is technically qualified to perform inspection/investigation report reviews for all types of radioactive material licenses issued by the Department. This procedure establishes the minimum training and qualifications necessary for QA Reviewers to perform independent reviews of inspection/investigation reports for radioactive material inspections and to provide methods for determining when training expectations have been met.

Initial qualification is achieved through formal classroom, on-the-job training and self-study training. New employee training is directed by the Radiation PSQA Manager with the assistance of the Radioactive Materials Inspection Group and the support of all Radiation Control units and groups.

Refresher training will be provided, as needed. The provision of refresher training recognizes training does not stop with initial qualification. Training is made available for experienced QA Reviewers and inspectors on the basis of need, special circumstances, and the necessity of keeping current with rule revisions, inspection and licensing program changes and changes in technology. At a minimum, regularly scheduled staff meetings will be used to provide refresher training to all QA Reviewer and inspection staff.

Orientation

On the first day of employment the new QA Reviewer will attend new employee orientation which is conducted by Division of Regulatory Services staff in the Division Office. This training will include all the information that needs to be completed using AccessHR. The orientation course includes obtaining identification documents/badges.

QA Reviewers are located in the Central Office and meeting radiation control staff and familiarization with the different Groups and Units within the Radiation Control program will be developed over time.

Formal Classroom Training

Every attempt will be made to provide for attendance at the following NRC sponsored courses for radioactive materials reviewer. The reviewer may be excluded from taking a course based on work experience or education.

1. Inspection Procedures Course (G-108)
2. Inspecting for Performance - Materials Version (H-111)
3. Root Cause/Incident Investigation Workshop (G-205)
4. Diagnostic and Therapeutic Nuclear Medicine Course (H-304)
5. Safety Aspects of Industrial Radiography Course (H-305)
6. Brachytherapy and Gamma Knife Course (H-313)
7. Transportation of Radioactive Materials Course (H-308)
8. Safety Aspects of Well Logging Course (H-314)
9. NRC Materials Control and Security Systems & Principles Course (Increased Controls)
10. Basic Health Physics Course
11. Health Physics Technology Course (H-201)

The reviewer will ensure that a copy of the certification of successful documentation is provided the manager for inclusion in their training file.

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The Radiation PSQA Manager may make a determination if the individual's education and/or experience will be substituted for the above course.

On-the-Job Training

Inspection Report Review - The majority of a reviewer's training will take place on-the-job (OJT). Initial training will be of the processing of inspection reports as they are received by Policy, Standards and Quality Assurance from the inspectors. RadPSQA – 001, Processing Radiation Routine Inspection Reports describes this process in detail. The reviewer-in-training (RIT) will work with a senior QA Reviewer as reports are reviewed; letters of compliance or Notices of Violations are issued. The process for referral of cases for Enforcement action and returning incomplete inspection reports to the inspector will be incorporated.

Inspections - The RIT will "shadow" senior inspectors on a wide variety of inspections followed by the review of an inspection report of the same modality with a senior QA Reviewer. It is recognized that inspection accompaniments may not occur before report review training is conducted in the modality. Observations of inspections will be coordinated between the Radiation PSQA Manager, Radioactive Materials Group Manager, the RIT and senior inspectors. The RIT will be asked to request assistance from senior inspectors and coordinate with them on schedules. The supervisors must be kept informed on communications between the RIT and inspection staff.

Guidance for preparing for the inspection will be provided along with the necessary resources (i.e. inspection forms, work instructions and regulations) to accompany the inspector. The RIT will become familiar with these documents and during the inspection, determine whether the operations conducted by the licensee are in compliance with the agency issued license and applicable state and federal regulations.

After the conclusion of each inspection, the senior inspector will prepare the inspection findings and submit the report to PSQA as outlined in RadPSQA -001 Processing Radiation Routine Inspection Reports. The senior inspector must include the name of the RIT on the report as accompanying them during the inspection.

The senior inspectors report will be assigned to the QA Reviewer training the RIT. The RIT will also complete an inspection report using the appropriate inspection forms and documenting his/her inspection findings. The RIT will submit the report to the senior QA Reviewer. The senior QA Reviewer and the RIT will review both inspection reports together. This joint review will give the RIT an appreciation of the balance between observations, demonstrations and interviews conducted during the inspection and the documentation of a performance based inspection.

Self-Study Training

Formal training and OJT will be supplemented with self-study reading of regulations, inspection report forms and work instruction and viewing of CD's of topics related to the area of training. The reviewer may be excluded from completing a portion of the self-study training based on work experience or education. The Radiation PSQA Manager may make a determination if the individual's education and/or experience will be substituted for the self-study material.

Appendix B-13 Question 6

Authorizations

Each inspection observation and inspection report review will be documented by the RIT on the qualification journal (QJ). Based on the QJ completion information and the evaluations, the supervisor or designee will observe the RIT on inspection report review with the purpose of evaluating the RIT's abilities. During the evaluation it may be determined that the RIT can be approved to perform independent inspection report reviews, but if necessary the recommendation for additional training may be made. Approval may come in sections (certain types of inspection reports) or as a whole based on experiences and training situations. Upon completion of training the RIT will receive authorization to perform independent inspection report reviews of all uses of radioactive material.

QUALITY ASSURANCE REVIEWER

QUALIFICATION JOURNAL

Employee:			***Title:***		
Office:				***Date Hired:***	

Training Outline	**Completion Date**	**Manager Review**
• Program Orientation		
Policy, Standard and Quality Assurance (PSQA) Training		
• PSQA Policies & Procedures		
RadPSQA – 001 Routing Reports &Returned reports		
RadPSQA – 003 Technical Review of an Inspection Report		
RadPSQA – 004 Standard violations		
RadPSQA – 006 Multiple Report Submission		
RadPSQA – 007 Report Referral for Enforcement Action		
RadPSQA – 008 Handling Sensitive Information		
RadPSQA – 009 Investigation & Discretionary Report Process		
RadPSQA – 010 Inspection Activity Codes for Radioactive Material		
• Report Writing		
• Enforcement Review Committee & Informal Conferences		
• Regulatory/Radiation Control Rules & Statutes Review		
General Radiation Safety Training		
NRC General Courses		
• Basic Health Physics Course		
• Health Physics Technology Course (H-201)		
• Inspection Procedures Course (G-108)		
• Inspecting for Performance – Materials Version (H-111)		
• Root Cause/Incident Investigation Workshop (G-205)		
• NRC Materials Control and Security Systems & Principles Course (Increased Controls)		
• Transportation of Radioactive Materials Course (H-308)		
General Self-Study Training CD's		
BR 10 Radiation Protection Standards – CD		

• BR 11 Radiation Bioeffects & Protection Principles – CD		
• HM 4 Principals of Radiation Safety – CD		
• NRC Training Course CD		
• RI 1 Dealing with Stray Radioactive Material – CD		
Other General Courses		
• Hazardous Materials Awareness 8 hour course, or equivalent (HAZMAT or HAZWOPER)		
• Radiological Emergency Response as identified by IIP Program		
Medical Uses Training		
Medical NRC Sponsored Courses		
Brachytherapy and Gamma Knife Course (H-313)		
Diagnostic and Therapeutic Nuclear Medicine Course (H-304)		
Inspection Accompaniment and Report Review Multiple dates should be listed in completion column		
• *Medical Diagnostic* - Observation		
Review of Medical Diagnostic Inspection Report		
• *Medical Therapy* – Inspection Observation		
Review of Medical Therapy Inspection Report		
• *Nuclear Pharmacy* – Inspection Observation		
Review of Nuclear Pharmacy Inspection Report		
• *Broad Scope Medical/Academic* – Inspection Observed		
Review of Broad Scope Medical/Academic Inspection Report		
Medical Self-Study Training CD's		
• BR 12 Radiation Protection during Nuclear Medicine Procedures - CD		
• RM1 Decontamination in NucMed LabCD		
• HM 1 A Light into Darkness - Historical review of radiology – CD		
• RM 2 Good Practices in Preparing & Administering Radiopharmaceuticals - CD		

Industrial Uses Training		
Industrial NRC Training Courses		
Safety Aspects of Industrial Radiography Course (H-305)		
Safety Aspects of Well Logging Course (H-314)		
Inspection Accompaniment and Report Review Multiple dates should be listed in completion column		
• *Portable Gauge* - Inspection Observation		
Review of Portable Gauge Inspection Report		
• *Fixed Gauges*- Inspection Observation		
Review of Fixed Gauge Inspection Report		
• *Industrial Radiography Fixed Facility* – Inspection Observation		
Review of Industrial Radiography Fixed Facility Inspection Report		
• *Industrial Radiography - Field Site* Inspection Observation		
Review of Industrial Radiography Field Site Inspection Report		
• *Industrial Radiography - X-Ray* – Inspection Observation		
Review of Industrial Radiography X-Ray Inspection Report		
• *Well Logging* – Inspection Observation		
Review of Well Logging Inspection Report		
• *Other Specific licenses* not listed – Inspection Observed		
Review of Inspection Report		
Industrial Self-Study Training CD's		
• Safety Procedures for Industrial Radiographers CD RI 2		

Quality Assurance Reviewer
Report Review & Enforcement Training

EXAMPLE

Orientation
Radiation Control Big Picture Power Point
PSQA's role in Radiation Control
Inspection Report Process – From submission to assigning to QA Reviewer

PSQA Procedures & Policies - Introduced into the training as the topic is covered
RadPSQA – 001 Routing Reports &Returned reports
RadPSQA – 003 Technical Review of an Inspection Report
RadPSQA – 004 Standard violations
RadPSQA – 005 Radiation Inspection Report Quality Assurance Review Standards
RadPSQA – 006 Multiple Report Submission
RadPSQA – 007 Report Referral for Enforcement Action
RadPSQA – 008 Handling Sensitive Information
RadPSQA – 009 Investigation & Discretionary Report Process
RadPSQA – 010 Inspection Activity Codes for Radioactive Material

PSQA Report Review and Writing
Information & Evidence Gathering
Hearing Preparation
The Technical Report
Report Accountability
Proof Reading
Report Reviews
Notices of Violation and Letters of Compliance
Review of Licensee responses

Inspection Preparation Resources
Inspection Report Forms
Inspection Work Instructions
Regulations

Enforcement Review Committee
Referral of Reports for Enforcement action
Research case
Presentation of case at PSQA Pre-ERC
Presentation case to ERC