

Inspection Manual Chapter 1246 Revision Working Group

Final Charter

PURPOSE

To revise and update Inspection Manual Chapter (IMC) 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area," Materials License Reviewer Qualification Journal and Materials Health Physics Inspector Qualification Journal. The revisions and updates will include (1) incorporating relevant recommendations made by the Independent External Review Panel (IERP) and the Materials Program Working Group (MPWG) to elevate security to be equal with health and safety in training, (2) updating the IMC and qualification journals to reflect the U.S. Nuclear Regulatory Commission's (NRC) approach to training that includes Individual Study Activities and On-the-Job Training modules, (3) updating the IMC and qualification journals to reflect regulatory and procedural changes that have occurred since the documents were last published.

BACKGROUND

In response to the vulnerabilities to the NRC licensing program, described in SECY-07-0147 "Response to U.S. Government Accountability Office Recommendations and Other Recommendations to Address Security Issues in the NRC Materials Program," NRC staff took immediate actions and implemented a pre-licensing evaluation process including onsite visits. In addition, staff developed an action plan to address needed changes in the NRC's radioactive materials licensing process. In the Staff Requirements Memorandum (SRM) dated September 18, 2007, the Commission approved the action plan. Working groups were established to implement the action plan, offer recommendations, and identify long term and short term strategies. The MPWG and IERP made several recommendations concerning the use of the good faith presumption concept in the licensing process; lack of security in licensing guidance; adoption of a security mindset by licensing and inspection staff, and process improvements for licensing and inspection training.

The qualification journals in IMC 1246 are used by the NRC and several Agreement States to ensure that personnel meet minimum knowledge and qualification standards and provide a standardized methodology for determining that materials license reviewers and materials health physics inspectors have met the established qualification requirements. IMC 1246 and the aforementioned qualification journals were last revised in 2001. The documents need to be revised to provide an updated qualification methodology.

MEMBERSHIP

The working group will operate as an NRC/Agreement State working group as described under NRC Management Directive 5.3 “Agreement State Participation in Working Groups.” The working group will be co-chaired by an NRC staff member and a representative who will represent both the Organization of Agreement States (OAS) and the Conference of Radiation Control Program Directors (CRCPD). The membership and responsibilities are depicted in the following table:

Organization	Working Group Members
FSME	Jack Foster, Co-Chair
OAS/CRCPD	Cindy Becker, Co-Chair (FL)
FSME	Tomas Herrera
Regional Office	Jim Dwyer (Region I)
HRTD	John Ricci

The working group will seek additional technical expertise on an as needed basis for the revisions to the qualification journals.

There will be no Steering Committee for this working group. The work products will be provided to Agreement States and NRC stakeholders for review and comment.

Jim Luehman, the Office of Federal and State Materials and Environmental Management Programs (FSME), the Division of Materials Safety and State Agreements (MSSA), will serve as the management representative for this working group. He should be kept informed of the working group’s activities.

Administrative support for the working group will be provided by MSSA.

OBJECTIVES

The working group has four main objectives.

The working group will revise IMC 1246 to: (1) provide licensing and inspection personnel with the tools and training necessary to make risk-informed decisions that address security aspects, as well as health and safety and foster a security culture, (2) update IMC 1246 to include new formal materials training and new licensing and inspection guidance and procedures (i.e. security inspection training, pre-licensing visits, naturally occurring or accelerator-produced radioactive material (NARM)), (3) change the format and content of IMC 1246 and qualification journals to more closely follow the apprentice style approach developed by the Office of Nuclear Reactor Regulation (NRR) for IMC 1245, and (4) determine if new classroom training should be developed or required for qualification as a license reviewer or inspector and address the need for the 5-week health physics course.

1. Incorporate Security Culture.

The working group must address the recommendations in the IERP/MPWG Recommendations Status Matrix that apply to IMC 1246. Revising the qualification journals in IMC 1246 to include classroom and practical training will provide trainees with a standardized exposure to the security of radioactive materials and elevate security to be equal with public health and safety as it pertains to the qualification journals. The working group must also address the need for and frequency of refresher training of security topics.

2. Update.

IMC 1246 will need to be updated to include revisions that include new training, pre-licensing guidance, NARM, and changes to refresher training requirements as they pertain to the qualification journals.

3. New Format.

IMC 1246 will be revised to adopt the methodology developed by NRR for IMC 1245. The approach taken in IMC 1245 includes individual study activities and on-the-job training modules. This method allows for a more practical training approach. The revised IMC 1246 will not need to follow the exact format in IMC 1245; however it should embrace a more apprentice style approach to training.

4. Classroom Training.

The working group will determine if new classroom training will need to be developed or if other classes should be made mandatory for qualification as a license reviewer or materials inspector. The working group will also address the need for the 5-work course offered by Oak Ridge Associated Universities as well as consider alternates to the course.

SCHEDULES

The working group began meeting on April 20, 2010.

The working group should interface with the management representative to seek guidance as needed or upon request by the management representative to discuss progress.

The working group will prepare a draft IMC 1246 document and qualification journals for materials license reviewers and materials health physics inspectors by September 15, 2010.

The revised IMC 1246, Materials License Reviewer Qualification Journal, and Materials Health Physics Inspector Qualification Journal should be sent to the Regions by September 20, 2010, for a 30-day comment period.

Regional comments should be resolved by November 2, 2010. The documents should then be sent to the Agreement States for a 30-day comment period by November 9, 2010.

Following the Agreement States 30-day comment period, barring any major changes and following comment resolution, the documents should be ready to be put into internal concurrence by January 20, 2011.

LEVEL OF EFFORT

Team members should expect to provide a substantial commitment to this working group until team objectives are completed.

All work associated with the IMC 1246 revision, i.e., meetings, reviews, and revisions should be charged to TAC JA0303 (Revision to IMC-1246 in Support of the GAO Action).

MEETINGS

Maximum use will be made of available media to facilitate interaction within and among the working group, for example, conference calls, e-mail, SharePoint, and the “go to meeting” service. Team meetings when indicated will generally be in the Washington, D.C. area.

/RA/	7/12/10
Jack Foster, Co-Chair	Date

/RA/	7/12/10
Cindy Becker, Co-Chair	Date