

**IMC 1248, Appendix C**

**Training Requirements and Qualification Journal for Materials Exempt Distribution  
License Reviewers**

## APPENDIX C

### TRAINING REQUIREMENTS FOR MATERIALS EXEMPT DISTRIBUTION LICENSE REVIEWERS

#### A. APPLICABILITY

The training described below is required for all materials license reviewers assigned to perform radiological safety reviews of exempt distribution license applications.

#### B. TRAINING

##### 1. Required Initial Training

###### a. Self Study and on-the job Training

- (1) NRC Orientation
- (2) Code of Federal Regulations
- (3) Office Instructions
- (4) Regulatory Guidance
- (5) NRC Management Directives
- (6) NUDOCS/ADAMS
- (7) Directed Review of Selected Licensing Case Work

###### b. Core Training. These courses establish minimum formal classroom training requirements. Refer to Section 1248-11 for exceptions to these requirements.

- (1) Health Physics Technology Course (H-201)
- (2) Licensing Practices and Procedures Course (G-109)
- (3) NMSS Radiation Worker Training Course (H-102)

###### c. Specialized Training. Additional courses may be required in order to gain knowledge necessary for specialized licensing activities. Management will make this determination on an individual basis.

##### 2. Supplemental Training. Additional training beyond that identified as Core Training. This training will be determined by the individual's supervisor and will depend on the individual's previous work experience and planned inspection or licensing activities in specific areas.

3. Refresher Training. Refresher training will include the following course and other courses as determined by management:
  - a. Health Physics Topical Review Course (H-401)

## MATERIALS EXEMPT DISTRIBUTION LICENSE REVIEWER NRC LICENSE REVIEWER QUALIFICATION JOURNAL

### Applicability

This NRC License Reviewer Qualification Journal implements NRC Manual Chapter 1248, by establishing the minimum training requirements for personnel assigned to perform license reviews for exempt distribution applications.

The NRC License Reviewer Qualification Journal serves as a guideline for the development of a Qualification Journal, and establishes the minimum training requirements consistent with NRC Manual Chapter 1248. The Qualification Journal must provide traceable documentation to show that minimum requirements are met for each license reviewer.

The NRC License Reviewer Qualification Journal consists of a series of qualification guides and signature cards. Each signature card is used to document task completion, as indicated by the appropriate signature blocks. The corresponding qualification guide establishes the minimum knowledge levels or areas of study that must be completed for each signature card.

Most of the qualification guides are divided into sections. The review sections of the qualification guides identify references with general application to the license reviewer's qualification. The license reviewer is expected to have a general familiarity with these references. Other sections of the qualification guides identify specific references that have direct application to the license review discipline. The license reviewer is expected to demonstrate detailed knowledge of the license review specific references.

In order to support the review of upper tier documents, programs, and policies, the license reviewer's immediate supervisor will assign specific materials licenses as reference licenses. The selection of reference licensees is intended to provide the license reviewer's management with the ability to tailor the qualification process to the experience and training level of the license reviewer, and to meet the needs of the NRC. The use of specific real world material will reinforce the qualification process.

LICENSE REVIEWER QUALIFICATION JOURNAL  
Materials Exempt Distribution License Reviewer

Name	Title	Branch	Section
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To complete your qualification as a Materials Exempt Distribution License Reviewer you are to complete the following signature cards. All signoffs shall include the signature of the responsible reviewer and the date. Maintain these cards in a notebook along with any background or written material required by the program. This notebook will comprise your NRC License Reviewer Qualification Journal.

	<u>Signature When Complete</u>	<u>Date</u>
1. NRC Orientation	First Line Supervisor	
2. Code of Federal Regulations	First Line Supervisor	
3. Office Instructions	First Line Supervisor	
4. Regulatory Guidance	First Line Supervisor	
5. NRC Management Directives	First Line Supervisor	
6. NUDOCS/ADAMS	First Line Supervisor	
7. Directed Review of Selected Licensing Case Work	First Line Supervisor	
8. Formal Training	First Line Supervisor	

Qualification Board Requirements Met	_____	_____
	Second Level Supervisor or Board Chairman	
Recommended as a qualified exempt distribution license reviewer	_____	_____
	Second Level Supervisor	
Certification Memo Issued granting signature authority	_____	_____
	Second Level Supervisor	

Signature Authority

- A. SIGNATURE AUTHORITY<sup>1</sup> - License signature authority is divided into two phases with reviewers authorized for more routine casework first and more complex casework later.
1. Phase I - Reviewer must demonstrate program knowledge by competent completion of a minimum of 5 - 10 new, renewal or amendment<sup>2</sup> licensing actions (at least 1 new or renewal licensing action in each category) under the supervision of the assigned senior reviewer in each of the following categories:
    - a. 32.14 (certain items)
    - b. 32.17 (resins)<sup>3</sup>
    - c. 32.18 (small quantities)
    - d. 32.21 (carbon-14 urea capsules)
  2. Phase II - Reviewer must demonstrate program knowledge by competent completion of at least 1 new, renewal or amendment<sup>3</sup> licensing action in each category under the supervision of the assigned senior reviewer in each of the following categories:
    - a. 32.11 (exempt concentrations and items)
    - b. 32.22 (self-luminous products)

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<sup>1</sup>As the reviewer completes the specific category knowledge and completed case requirements, the reviewer can be delegated signature authority for that specific category.

<sup>2</sup>The amendment would consist of a change of ownership, new product or device review and would be considered of an equivalent difficulty level as a new or renewal licensing action.

<sup>3</sup>When the reviewer meets the §§32.14 and 32.18 category requirements, signature authority for §32.17 will be automatically delegated.

c. 32.26 (smoke detectors)

Competency will be determined by review of completed deficiency letters and licenses, and an oral examination of exempt distribution licensing, conducted by the Section Leader or the assigned senior health physicist/exempt license reviewer. The Section Leader or the assigned senior health physicist/exempt license reviewer will complete Qualification Guide 6 for each license reviewed, and will discuss comments with the license reviewer-in-training.

Qualification Card 1  
NRC Orientation

A. Site Orientation

Initials

Date

1. New employee processing package completed

\_\_\_\_\_  
Employee

2. Facility tour and introduction

\_\_\_\_\_  
First Line Supervisor

B. NRC Organization

1. Review of NRC headquarters and regional organization

\_\_\_\_\_  
Employee

2. Discussion of NRC organization

\_\_\_\_\_  
First Line Supervisor



Qualification Card 2  
Code of Federal Regulations(CFR)

	<u>Initials</u>	<u>Date</u>
A. Familiarization with selected CFR parts completed	_____ Employee	_____
B. Discussion completed on CFR parts related to the materials license review program	_____ First Line Supervisor	_____

Qualification Card 3  
Office Instructions

	<u>Initials</u>	<u>Date</u>
A. Familiarization with office policies and procedures	_____ Employee	_____
B. Discussion completed on office policies and procedures	_____ First Line Supervisor	_____

Qualification Card 4  
Regulatory Guidance

	<u>Initials</u>	<u>Date</u>
A. Review of regulatory guidance		
1. Regulatory Guides	_____ Employee	_____
2. Information Notices /Bulletins	_____ Employee	_____
3. NUREGs	_____ Employee	_____
4. Generic Letters	_____ Employee	_____
5. Federal Register Notices	_____ Employee	_____
6. NRC Branch Technical Positions	_____ Employee	_____
7. Policy and Guidance Directives	_____ Employee	_____
8. Standard Deficiency Paragraphs	_____ Employee	_____
9. Standard License Conditions	_____ Employee	_____
10. Licensing Checklists	_____ Employee	_____
11. Standard Review Plans	_____ Employee	_____
12. Sealed Source and Device Registry	_____ Employee	_____

13. Technical Assistance Requests

\_\_\_\_\_  
Employee

B. Discussion of regulatory guidance  
with application to the materials  
license review program

\_\_\_\_\_  
First Line Supervisor

Qualification Card 5  
NRC Management Directives

	<u>Initials</u>	<u>Date</u>
A. Review of selected portions of the NRC Management Directives completed	_____	_____
	Employee	
B. Discussion of the application of the NRC Management Directives to the materials license review program	_____	_____
	First Line Supervisor	

Qualification Card 6  
NUDOCS/ADAMS

	<u>Initials</u>	<u>Date</u>
A. Review of selected portions of the NUDOCS/ADAMS User's Manual and system access completed	_____ First Line Supervisor or Senior license reviewer	_____
B. Familiarization with NUDOCS/ADAMS station(s) and operation	_____ Employee	_____

Qualification Card 7  
Directed Review of Selected Licensing Case Work

	<u>Initials</u>	<u>Date</u>
A. Review of selected licensing Casework	_____ Employee	_____
B. Completion <sup>4</sup> of Phase 1 (QG 7)/ Discussion by First Line Supervisor of directed review of the selected casework and its relation to exempt distribution license review program	_____ First Line Supervisor	_____
C. Completion <sup>1</sup> of Phase 2 (QG 7)/ Discussion by First Line Supervisor of directed review of the selected casework and its relation to the exempt distribution license review program	_____ First Line Supervisor	_____

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<sup>4</sup>As the reviewer completes the specific category knowledge and completed case requirements, the reviewer can be delegated signature authority for that specific category.

Qualification Card 8  
Formal Training

		<u>Initials</u>	<u>Date</u>
A,	CORE TRAINING:		
1.	Health Physics Technology Course (H-201) (or classification as a 1306)	Training Coordinator	
2.	Licensing Practices and Procedures Course (G-109)	Training Coordinator	
3.	NMSS Radiation Worker Training Course (H-102)	Training Coordinator	

B. SPECIALIZED TRAINING:

Other specialized training courses required for license reviewers performing licensing activities in specific areas:

<u>Course Title</u>	<u>Course #</u>	<u>Initials</u>	<u>Initials</u>	<u>Date</u>
		Supervisor	Training Coordinator	
		Supervisor	Training Coordinator	
		Supervisor	Training Coordinator	



## Qualification Guide 1 NRC Orientation

### A. Site Orientation

1. The qualifying individual should read and complete, as appropriate, the following forms for processing into the NRC:
  - a. Personnel information
  - b. Health insurance elections
  - c. Retirement plan elections
  - d. Savings elections (e.g. U.S. Savings Bonds, TSP, etc.)
  - e. Fitness for Duty requirements and physical examination
  - f. Any other forms which may be required by NRC Office of Human Resources
  - g. Forms for issuance of tagged, controlled NRC equipment
  - h. Payroll forms and time cards
  - i. Regulatory Information Tracking System (RITS)
2. The First Line Supervisor should orient the qualifying individual to the facility as follows:
  - a. Tour the facility and introduce the qualifying individual to the staff
  - b. Indicate to the qualifying individual the location of controlled documents, reference material, supplies, office equipment, classrooms, etc.

### B. NRC Organization

1. The qualifying individual should review and become familiar with:
  - a. Organizational charts of division, NMSS, regions and headquarters and overall NRC organization (NUREG 0325)
  - b. Role of Headquarters in policy and interpretation of regulations
  - c. Role of NRC General Counsel
  - d. Role of NRC Inspector General
  - e. Role of NRC Public Affairs

- f. Role of NRC Office of Investigations
  - g. Role of NRC Office of Enforcement
  - h. Physical location of NRC offices and regions
  - i. Role of NRC as a regulatory agency
    - (1) 10 CFR Part 1 (Organization)
    - (2) Atomic Energy Act of 1954, as amended
    - (3) Energy Reorganization Act of 1974, as amended
    - (4) NRC Enforcement Policy (NUREG 1600)
    - (5) Incident Response Plan (NUREGs 0728 and 0845)
    - (6) Energy Policy Act of 1992
2. The First Line Supervisor should discuss NRC organization and role with the qualifying individual to ensure the qualifying individual has a full understanding of NRC's organization and mission and the role of the license reviewer in that mission.

Qualification Guide 2  
Code of Federal Regulations (CFR)

A. A selection of currently applicable CFR Parts should be made by the First Line Supervisor. The selection should include the references listed below and be documented. The qualifying individual should be expected to have a general knowledge of the topics addressed in the references. This review may be accomplished by self-study, study-quizzes, briefings, or discussions.

1. 10 CFR Part 1 Statement of organization and general information
2. 10 CFR Part 2 Rules of practice for domestic licensing proceedings and issuance of orders
3. 10 CFR Part 9 Public Records
4. 10 CFR Part 19 Notices, instructions and reports to workers; inspections
5. 10 CFR Part 20 Standards for protection against radiation (includes selected Questions and Answers, Q & As)
6. 10 CFR Part 21 Reporting of defects and noncompliance
7. 10 CFR Part 30 Rules of general applicability to domestic licensing of byproduct material
8. 10 CFR Part 31 General domestic licenses for byproduct material
9. 10 CFR Part 32 Specific domestic licenses to manufacture or transfer certain items containing byproduct material
10. 10 CFR Part 40 Domestic licensing of source material
11. 10 CFR Part 70 Domestic licensing of special nuclear material
12. 10 CFR Part 71 Packaging and transportation of radioactive material
13. 10 CFR Part 110 Export and import of nuclear equipment and material
14. 10 CFR Part 170 Fees for facilities, materials, import and export licenses and other regulatory services under the Atomic Energy Act of 1954, as amended
15. 10 CFR Part 171 Annual fees for reactor operating licenses, and fuel cycle licenses and materials licenses, including holders of certificates of compliance, registrations, and quality assurance program approvals and government agencies licensed by NRC

16. 49 CFR Part                      Transportation  
173.421

17. 10 CFR Parts                      Statements of Consideration  
30, 31, and 32

- B. Following completion of the qualifying individual's self study of the listed 10 CFR Parts, a discussion will be held with the qualifying license reviewer by the First Line Supervisor to test the qualifying license reviewer's knowledge of these Parts. To the extent possible, recent application of various sections, new regulatory initiatives, and current industry issues should be emphasized.

Qualification Guide 3  
Office Instructions

- A. Office/Division Policies and Procedures
1. Read the Office/division Policy and Procedures Manual
  2. The qualifying individual should review the Office/Division policies and practices on:
    - a. Travel, including Management Directive 14.1 Official Temporary Duty Travel
    - b. Telephone use
    - c. Policies on use of annual leave and sick leave and excused leave, including Bulletin 4135, Leave Administration.
    - d. Work schedule, including NRC Appendix 4136, Hours of Work and Premium Pay
    - e. Use of government equipment, including computers (NUDOCS and ADAMS) and Management Directive 13.1, Property Management
    - f. Union activities, including Management Directive 10.102, Labor-Management Relations Program for Federal Employees
    - g. Communications outside NRC
    - h. Policies on outside employment and acceptance of gifts
    - i. Participation in political activities
    - j. Routing of mail and procedures for sending mail and materials (via U.S. Mail, Federal Express, etc.), including Management Directive 3.23, Mail Management
    - k. Ordering of documents (e.g., NUREGs)
    - l. Division emergency and evacuation procedures
    - m. Employee appraisal system and Individual Development Plan (IDP)
      - (1) Employee trial period (Management Directive 10.14 Employment and Staffing)
      - (2) Employee appraisals (Management Directive 10.67, Non-SES Performance Appraisal System)
    - o. Differing Professional Views or Opinions (Management Directive 10.159, General Personnel Management Provisions)

- B. The First Line Supervisor should discuss these policies and practices with the qualifying individual to ensure that the qualifying individual has a full and complete understanding.

Qualification Guide 4  
Regulatory Guidance

A. A selection of currently applicable regulatory guidance should be identified by the First Line Supervisor. These references should include those listed below and should be documented. The qualifying individual should be expected to have a general knowledge of the topics addressed in the references. The review may be accomplished by self-study, study-quizzes, briefings, or discussions. Note that many Regulatory Guides reference or endorse industry codes and standards listed in Qualification Guide 6. Study of corresponding and sub-tier codes and standards is recommended.

1. Regulatory Guides (use latest revision)

6.6 Acceptance Sampling Procedures for Exempted and Generally Licensed Items Containing Byproduct Material

6.9 QA Programs for Manufacture & Distribution of Sealed Sources and Devices Containing Byproduct Material

2. Information Notices(IN) and Bulletins(BL)

IN 94-047 Accuracy of Information Provided to NRC During the Licensing Process

Others as selected by the First Line Supervisor

3. NUREGs (latest revision, where applicable)

NUREG 1460 Guide to NRC Reporting and Recordkeeping Requirements

NUREG 1556 Consolidated Guidance About Materials Licenses:

Vol. 3: Applications for Sealed Source and Device Evaluation and Registration

Vol. 8: Program-Specific Guidance About Exempt Distribution Licenses

Vol. 15: Program-Specific Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses

NUREG/CR 1775 Environmental Assessment of Consumer Products Containing Radioactive Material

Others as selected by the First Line Supervisor

4. Generic Letters (GL)  
GL 88-004 Distribution of Gems Irradiated In Research Reactors  
Others as selected by the First Line Supervisor
5. Policy and Guidance Directives
6. Standard Deficiency Paragraphs
7. Standard License Conditions
8. Licensing Checklists
9. Sealed Source and Device Registry
10. Technical Assistance Requests  
As selected by the First Line Supervisor

B. The application of these guidance documents to the materials license review program should be studied in detail by the qualifying individual and covered by the First Line Supervisor in discussions, interviews, or oral quizzes.



Qualification Guide 5  
NRC Management Directives

A. A selection of currently applicable NRC Management Directive (MD) references should be identified by the First Line Supervisor. These references should include those listed below and be documented. The qualifying license reviewer should be expected to have a general knowledge of the topics addressed in the references. This review may be accomplished by self-study, study-quizzes, briefings, or discussions. The selection should include:

- |                   |  |
|-------------------|--|
| 1. NRC MD 9.1     | Organization Management                                |
| 2. NRC MD 9.29    | Organization and Function of Regional Offices          |
| 3. NUREG 0325     | USNRC Functional Organization Chart                    |
| 4. NRC MD 3.2     | Privacy Act  |
| 5. NRC MD 3.1     | Freedom of Information Act                             |
| 6. NRC MD 10.131  | Protection of NRC Employees Against Ionizing Radiation |
| 7. NRC MD 14.1    | Official Temporary Duty Travel                         |
| 8. NRC MD 10.159  | Differing Professional Views or Opinions               |
| 9. NRC MD 10.42   | Hours of Work and Premium Pay                          |
| 10. NRC MD 10.43  | Time and Attendance Reporting                          |
| 11. NRC MD 10.67  | Non-SES Performance Appraisal System                   |
| 12. NRC MD 10.101 | Employee Grievances                                    |
| 13. NRC MD 8.8    | Management of Allegations                              |

B. Application of the selected NRC Management Directives to the materials license review program will be discussed with the qualifying individual by the First Line Supervisor to test the qualifying individual's knowledge.

Qualification Guide 6  
NUDOCS/ADAMS

The use and training for NUDOCS/ADAMS will consist of a PDC course in using ADAMS; review of the NUDOCS User Manual; ADAMS USER GUIDE; knowledge of NUDOCS station(s), access, and operation to locate NRC (Non-ADAMS) document records; knowledge of capturing and retrieving ADAMS documents.

Qualification Guide 7  
Certification - Directed Review of Selected Licensing Case Work

Amendment No.: \_\_\_\_\_ Control No.: \_\_\_\_\_

Licensee Name: \_\_\_\_\_

Address: \_\_\_\_\_

License No.: \_\_\_\_\_ Docket No.: \_\_\_\_\_

Reference No.: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Action Type:	New License	_____	New License/Licensee	_____
	Renewal	_____	Product Transfer	_____
	Amendment	_____	Termination	_____

Program Code/Type:

Exempt Concentrations (Gemstones)	03251/32.11	_____
Certain Items (Electron tubes, Watches)	03251/32.14	_____
Resins	03252/32.17	_____
Small Quantities (Check sources)	03253/32.18	_____
Carbon-14 urea capsules	03256/32.21	_____
Self Luminous Products (Watches, Gunsights)	03254/32.22	_____
Gas & Aerosol Detectors (Smoke detectors)	03255/32.26	_____

I certify that I have reviewed the licensee's request dated \_\_\_\_\_ as supplemented by any letters referenced in the license and in accordance with guidance provided by the Office of Nuclear Material Safety and Safeguards applicable Standard Review Plans and the attached checklist.

\_\_\_\_\_  
REVIEWER DATE

\_\_\_\_\_  
PERSON SIGNING THE LICENSE DATE

GENERAL COMMENTS: \_\_\_\_\_

Qualification Guide 8  
Formal Training

The standards for each Training Course are provided in the NRC Technical Training Center Course Catalog and will not be duplicated in the Qualification Guide.

Attachment 1  
Revision History for IMC 1248, Appendix C

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Accession Number
N/A	ML112360125 10/26/11 CN 11-022	Revision history sheet added. Combined Appendix A11 with Appendix B11 and renamed as IMC 1246 Appendix E6. Added "training requirements" section from Appendix A11.	N/A	ML112360165
N/A	ML12240A154 04/19/13 CN 13-011	IMC 1248 Appendix C was created to replace IMC 1246 Appendix E6 and remove FSME activities from the NMSS qualification journal IMC 1246 series. The qualification was originally published on January 5, 2001. No changes were made to the training requirements or qualification journal since they were published on January 5, 2001.	N/A	N/A