

Appendix A

Basic-Level Training and Qualification Journal

Table of Contents

Introduction	1
Required Basic-Level Training Courses	3
Basic-Level Individual Study Activities	5
(ISA-1) History and Organization of the U.S. Nuclear Regulatory Commission	5
(ISA-2) Navigating the NRC Internal and External Web Sites	7
(ISA-3) Inspector Objectivity, Protocol, and Professional Conduct	11
(ISA-4) Fitness-for-Duty Rule	14
(ISA-5) Allegations	16
(ISA-6) NRC's Response to an Emergency at a Nuclear Facility	19
(ISA-7) The Enforcement Program	21
(ISA-8) The Office of Investigations	24
(ISA-9) Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page	25
(ISA-10) Performance Indicator Program	29
(ISA-11) Augmented Inspection Team, Special Inspection Team, and Incident Inspection Team Activities	31
(ISA-12) Understanding How the Commission Operates	33
(ISA-13) Organization and Content of the NRC Inspection Manual	34
(ISA-14) NRC Interagency Agreements	36
(ISA-15) Interaction with the Public	38
(ISA-16) Contacts with the Media	41
(ISA-17) Institute of Nuclear Power Operations, Nuclear Energy Institute, and National Organization of Test, Research and Training Reactors	43
(ISA-18) The Freedom of Information Act and the Privacy Act	45
(ISA-19) Entrance and Exit Meetings	47
(ISA-20) Documenting Inspection Findings	49
(ISA-21) Open, Collaborative Working Environment & Ways to Raise Differing Views	51
(ISA-22) Overview of 10 CFR Part 50	53
(ISA-23) Overview of 10 CFR Part 19 and 10 CFR Part 20	55
(ISA-24) Licensee-Specific Regulatory Documents and Procedures	57
(ISA-25) Security Requirements for Nuclear Power Plants	60
(ISA-26) Exploring the Operating Reactor Assessment Program	62
(ISA-27) Generic Communications	64
Basic-Level On-the-Job Activities	66
(OJT-1) Facility Familiarization Tour with a Qualified Inspector	68
(OJT-2) Control Room Tour with Resident or Other Qualified Inspector	71
(OJT-3) Licensee Plan-of-the-Day Meeting, Documents, or Information (for power reactor inspectors only)	73
(OJT-4) Inspection Activities	75
(OJT-5) Documenting Inspection Findings	78

Basic-Level Signature Cards and Certification	81
<i>Form 1: Basic-Level Equivalency Justification.....</i>	<i>83</i>
Attachment 1: Revision History Sheet	85

Introduction

The U.S. Nuclear Regulatory Commission (NRC) inspector training and qualification program requires completion of 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. It is recommended that trainees take ADAMS training early in the training process as some training documents are only available in ADAMS.

1. A competent inspector must accomplish the following:
 - a. Understand the legal basis for and the regulatory processes used to achieve the NRC's **Basic-Level On-the-Job Activities** of the NRC organizational structure and objectives (Regulatory Framework).¹
 - b. Understand the basis for the authority of the agency (Regulatory Framework).
 - c. Understand 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 in the following way:
 - a. Understand science and engineering fundamentals in your field of expertise (Fundamental Plant Design and Operation).
 - b. Develop and maintain an understanding of how basic nuclear plant design and operations provide for protection of public health and safety (Fundamental Plant Design and Operation).
 - c. Use 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 doing the following:
 - a. Independently gather information through objective review, observation, and open communications (Inspection).
 - b. Determine the acceptability of information by comparing to established criteria (Inspection).
 - c. Respond to events or conditions involving potential or actual adverse safety consequence (Emergency Response).
 - d. Approach problems objectively, gather and integrate information, and develop a comprehensive understanding before reaching a conclusion (Problem Analysis)
 - e. Objectively analyze and integrate information using a safety focus to identify the appropriate regulatory conclusion and regulatory response (Assessment and Enforcement).

¹Competency areas are listed in parenthesis following each item.

4. Develop the personal and interpersonal skills necessary to carry out assigned regulatory activities, either individually or as part of a team, by doing the following:
 - a. Clearly express ideas or thoughts, carefully listen, and speak and write with appropriate safety focus and context (Communication).
 - b. Work collaboratively with others toward common objectives (Teamwork).
 - c. Work independently, exercise judgment, and exhibit flexibility in the completion of activities, including during difficult or challenging situations (Self-Management).
 - d. Use 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 onsite 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 activities. 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. No set time exists for completing each segment of the program, and there is no exact limit on the number of times you practice on-the-job activities. 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 Proficiency Level, which has two parts. One part focuses on General Proficiency activities, which are designed to develop your interpersonal and inspection skills. The second part focuses on Technical Proficiency activities, which are designed to develop your technical expertise in one of the inspector classifications. The final activity in the Proficiency Level is to appear before a qualification board. Successfully appearing before the qualification board will ensure 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 proficiency-level activities, including the qualification board, you will be eligible to receive a *Full Inspector Qualification*. As a fully qualified inspector you will be assigned the full scope of inspection activities to perform independently.

You will need to complete three qualification journals (Basic Level, General Proficiency Level and Technical Proficiency Level) during the inspector qualification process. You may work on the General and Technical Proficiency Journals at the same time. Each journal identifies the classroom requirements and provides the individual study activities and 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 and Proficiency Levels, 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:

- H-100, Site Access training
- R-100, Reactor Concepts (for power reactor inspectors only)
- 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 as part of ISA-25
- P-105, PRA Basics for Regulatory Applications (for power reactor inspectors only)
- G-104, Expectations for Inspectors
- Industrial Safety Training in iLearn (all courses except Chemical Process Safety)—Web-based as part of OJT-1

Interpersonal Skills Training

The interpersonal skills training courses listed below are not required until the Proficiency Level for *Full Inspector Qualification*. However, they can be taken at any time during the inspector qualification process. It is recommended that trainees observe an entrance and exit meeting, or discuss the objectives of these meetings, with a qualified inspector before attending the Effective Communication for NRC Inspectors course. Successful completion of any of the following courses should be documented on the signature card in the General Proficiency Qualification Journal:

- Effective Communication for NRC Inspectors

- Gathering Information for Inspectors through Interviews

Technical Training

Technical training may be started at this level, provided that the training does not require the successful completion of the Basic Level as a prerequisite.

Basic-Level Individual Study Activities

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.) 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 focus on what is most important. The **tasks** outline the things you must do to successfully address the evaluation criteria.

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

- ✓ The first three 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 for evaluation.

Basic-Level Individual Study Activity

TOPIC: (ISA-1) History and Organization of the U.S. 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:

1. Title 10 of the Code of Federal Regulations (CFR)
2. NUREG-1350, "Information Digest," August 2006 (NUREGs are located in the Document Collections section of the NRC Library on the public Web page)
3. NUREG/BR-0175, "A Short History of Nuclear Regulations," Revision 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 Commission, the Office of the Inspector General, Office of the Secretary (SECY), the Atomic Safety and Licensing Board, the Advisory Committee on Reactor Safeguards, and Commission staff and program offices, including the Chief Financial Officer and Executive Director for Operations.
4. Describe your region or office's organization and key management positions.

5. Discuss the relationship between the NRC and the Department of Energy (DOE).

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. You can find electronic copies of documents on the NRC external Web site 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-1.

Basic-Level Individual Study Activity

TOPIC: (ISA-2) Navigating the NRC Internal and External Web Sites

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. Thus, you 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:

1. NRC internal and external Web sites
2. 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 sites being unavailable at times. Complete as much as 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 Agencywide.

- b. Locate the Ethics area.
 - i. Review the information available.
 - ii. Note the various sources of ethics advice.
- c. Locate the Library Services area (NRC Technical Library) and review the available information.
- d. Locate the Office of Nuclear Reactor Regulation's (NRR) 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 (see POEB on NRR site index), and Office Instructions
 - iii. For power reactor inspectors, find the Reactor Oversight Process (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 Programs' home page and 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 bookmark it. Review the functions of the office.
- h. Locate the 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 regional 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 allegor.
- k. Locate the agency's iLearn 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.
 - iii. Review how to enroll in a course.
 - iv. Locate the Self-Paced Learning area
 - v. Find the Web-based allegation management training.
 - vi. Review the list of available Web-based learning opportunities.
 - vii. Review the list of other available self-paced learning opportunities.
- I. Under the NRC Web Applications link, locate the NRC Knowledge Center (NKC).
- i. Review the information on new accounts and memberships on the NKC presentation in ADAMS as ML090930410.
 - ii. Request an NKC account.
 - iii. Review the Communities of Practice (CoP) available on the NKC.
 - iv. Select a CoP in an area of interest to you. (It may be necessary to become a member of the CoP to view the information if SUNSI material is there.)
 - Review the documents posted in that CoP.
 - Review past questions and answers in the CoP.
 - Review the subscription options available to be notified of updates to the CoPs
- m. Locate the Reactor OpE Information Gateway (NRR Website).
- i. Determine what information is available and how to conduct specific searches. If needed, complete the OpE Gateway Search Tutorial.
 - ii. Subscribe to OpE emails by clicking on the “OpE Community Subscription Site.” Then, enter your NRC LAN ID (e.g., RAM3) and click the green “GO” button on the right. Under “**Clearinghouse Groups**,” check the OpE Screening Summary box. Under “**OpE Community Groups**,” check the All Communications box.
 - iii. Determine the purpose of the OpE Smart Sample Program and review several recent examples
2. Explore the NRC’s external (public) server.
- a. Go to the NRC Library.
 - i. Find the Glossary (Basic References).
 - ii. Find the NRC Inspection Manual and bookmark it (Document Collections).
 - iii. Find Regulatory Guides. Read about the purpose of a regulatory guide (RG).
 - iv. Locate Generic Communications documents. Review the purpose of each type of generic communications. Review several recently issued documents of each type.

- 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 CFR.
 - How many volumes comprise Title 10? What parts are applicable to the NRC?
 - Use the search feature and search on “radiation protection.” View one of the documents to read about what a recent change to the CFR involved.
 - 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 Act and the Freedom of Information Act (FOIA).
- b. Go to About NRC. Locate and review the rulemaking process under How We Regulate.
 - c. Go to Nuclear Reactors (For power reactor inspectors only).
 - i. Generally review the information relating to Operating Reactor Oversight and the ROP.
 - ii. Generally review the information found in the Performance Indicators Summary and Inspection Findings Summary located under Reactor Oversight Process (ROP) > “Performance Summaries.” Choose a plant and review that data.

DOCUMENTATION: Obtain your supervisor’s signature in the line item for 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. Professionalism is essential to the agency's ability to fulfill its goals of protecting public health and safety. Inspector conduct is a vital component of 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 AREAS: INSPECTION
SELF-MANAGEMENT

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NRC Inspection Manual Chapter (IMC) 0102, "Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities"
2. MD 7.5, "Ethics Counseling and Training"
3. IMC 1201, "Conduct of Employees"
4. IMC 2515 Section 12.06, "Witnessing Unsafe Situations"
5. Regional or office guidance related to inspector/employee conduct.
6. Appendix B of Inspection Procedure 71153, "Followup of Events and Notices of Enforcement Discretion"
7. Management Directive 8.17 "Licensee Complaints Against NRC Employees"
8. The Ethics page of OGC's Website

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 unions
 - d. property and neighborhood relationships
 - e. community activities
 - f. employment of spouse and children
3. Explain the Office of Government Ethics 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 onsite 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. Explore the information available on the Ethics page of OGC's Website particularly the information on the Ethics Advice and Articles tab. Find and read the Summary of Major Ethics Rules for NRC Employees (Ethics Articles) and Announcement 129 dated December 2009 (Ethics Yellow Announcements). Complete the New Employee Ethics Training under the Training tab. Be sure to print the completion record at the end of the online 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. Although the agency has a code for employee/inspector conduct, not all regions or offices have specific guidance in this area. You should closely review the guidance applicable to your position. 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).
3. Meet with your regional counsel 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.
4. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-3.

Basic-Level Individual Study Activity

TOPIC: (ISA-4) Fitness-for-Duty Rule

PURPOSE: The purpose of this activity is to provide you with an understanding of the Fitness-for-Duty Rule (FFD). Nuclear power plants and certain other NRC licensees are required to have FFD 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 Part 26, "Fitness for Duty Programs," but according to 10 CFR 55.53(j) each licensed operator is required to meet FFD performance standards and according to 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:**
1. Enforcement Manual, Chapter 7.15, "Enforcement Actions Involving Fitness-For-Duty (FFD)" (research and test reactors [non-power reactors] are subject to this enforcement guidance only if there has been a program for drug and alcohol testing established for that non-power reactor.)
 2. 10 CFR Part 26, "Fitness for Duty Programs"
 3. SECY 00-0022, "Rulemaking Plan, "Decrease in the Scope of Random Fitness-for-Duty Testing Requirements for Nuclear Power Reactor Licensees," for Amendments to 10 CFR Part 26"
 4. NUREG-1912, "Summary and Analysis of Public Comments Received on Proposed Revisions to 10 CFR Part 26 – Fitness for Duty Programs" Section 4.2, "Performance Objectives" and Section 4.4.3, "Procedures"

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's FFD rule by successfully addressing the following:

1. State the purpose of the NRC's FFD rule and which licensees are required to meet this rule.

2. Explain why the FFD 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 FFD rule.
4. Answer the following questions related to FFD. To whom does the FFD rule apply? Can a licensee deny access to an NRC inspector that they suspect has been drinking? If not, what can the licensee do about it? What are the reporting requirements associated with FFD violations committed by licensed operators, supervisory personnel, and maintenance technicians?

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 FFD rule and drug testing program guidance provided on the NRC Web site.
4. 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: Obtain your supervisor’s signature in the line item for 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 familiarize the candidate with the procedures, guidance and activities applicable to handling the receipt, processing, review and closure of allegations. This study activity will help you to effectively interact with individuals bringing concerns to the NRC and to appropriately respond to those concerns.

COMPETENCY AREAS: INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. MD 8.8, "Management of Allegations"
2. Allegation Manual
3. NRC Form 613, "Disclosure of Allegor's Identity"
4. Allegation Manual, Exhibit 1, "Information to be Obtained/Provided During the Initial Contact with the Allegor" or equivalent allegation receipt guidance
5. 10 CFR Part 50.5, "Deliberate Misconduct"
6. 10 CFR Part 50.7, "Employee Protection"
7. 10 CFR Part 50.9, "Completeness and Accuracy of Information"
8. Regional or office guidance on allegations
9. NUREG/BR-0240, "Reporting Safety Concerns to the NRC"
10. Office of Enforcement Webpage

EVALUATION CRITERIA:

1. Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's allegation process by successfully addressing the following:
2. State the criteria used to evaluate submitted information to determine if it is an allegation.

3. State the information that is required to be obtained during the receipt of a potential allegation.
4. State the role of the Office Allegation Coordinator (OAC).
5. State the purpose of, and the actions taken, in preparation for an Allegation Review Board (ARB).
6. State the information that should be provided to an ARB.
7. Describe the allegation evaluation methods that may be directed by the ARB and discuss what information is needed to close the allegation for each approach.
8. State the purpose of, and the information needed, to prepare allegation closure documentation.
9. Explain what an Ad-Hoc/Emergency ARB is and when it is used.
10. State who is required to be on the ARB.

TASKS:

1. Review the applicable regulations and guidance listed in the reference section.
2. Complete the Web-based training module on allegations. To access the allegations training, select Training on the NRC internal Web site. Select Web-Based under Training Courses and select Allegations Training. Print the completion certificate at the end of the online allegations training as evidence that you have successfully completed the course. A regional or program office training activity with equivalent content may be substituted.
3. Review the applicable regional or office guidance for allegations.
4. Meet with the OAC and have him/her brief you on the allegation process and the OAC's role in the process.
5. Review two closed allegation case files (if possible, one should include an inspection effort) to:
 - a. Identify how incoming correspondence or information was determined to meet the definition of an allegation and how specific concerns were identified.
 - b. Review associated ARB documentation, particularly the determination of safety significance and the proposed action plan.

- c. Review the associated allegation closure memorandum or closure letter to understand the rationale and basis for allegation closure.
- 6. Discuss with your supervisor or OAC the options available to the NRC to follow-up on an allegation and the circumstance when each is appropriate.
- 7. Obtain the inspection results and/or licensee review information if a request for information (RFI) has been sent to the licensee. Discuss the precautions and limitations associated with RFIs with your supervisor or the OAC.
- 8. Attend two ARB meetings.
- 9. Working with your supervisor or OAC:
 - a. For a recently received (or simulated) allegation, complete the required documentation to present the concern at an ARB meeting. Include a discussion of safety significance and regulatory requirements/issues.
 - b. Discuss with your supervisor or OAC a proposed plan to resolve the recently received (or simulated) allegation.
 - c. Obtain the inspection and/or investigation results for a recently closed (or simulated) allegation; compare the results to the original concerns. Discuss with your supervisor or OAC how the inspection results addressed the concerns. Discuss whether the allegation concerns were substantiated and how you would respond to the alleged.
- 10. Meet with your supervisor or the OAC to discuss any questions that you may have as a result of this activity and to demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: Obtain your supervisor's signature in the line item for 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: 12 hours

- REFERENCES:**
1. NRC internal Web page (Program Office>Nuclear Security and Incident Response (NSIR))
 2. MD 8.2, "NRC Incident Response Program"
 3. Regional Policy Guide for Emergency Response
 4. NUREG-0728, "NRC Incident Response Plan" (<http://www.nrc.gov/about-nrc/emerg-preparedness/respond-to-emerg/ml050970236.pdf>). Note: This NUREG is revised periodically to reflect changes to the agency's activities. Be sure to obtain the most recent version.
 5. IP 71153 Appendix B, "Limiting NRC Impact During Events"

- 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. Identify the different modes of NRC emergency response and describe the purpose of each mode.

3. Discuss the capabilities (e.g., communications, information technology) provided in the Headquarters, Regional, and onsite emergency response facilities.
4. 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 event:
 - a. resident staff
 - b. region-based staff
 - c. headquarters staff
 - d. headquarters operations officer
 - e. licensee
 - f. State and local officials
 - g. site team
 - h. base team
5. If you are onsite when an emergency is declared, explain the difference in your actions if the resident inspectors are and if they are not onsite. Describe the protocol for limiting unnecessary impact on licensee activities during an event.

TASKS:

1. Explore all aspects of the NSIR Organization presented on the NRC's internal home page.
2. Review your region or office's policy guidance on emergency response.
3. 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.
4. Regional inspectors meet the incident response coordinator, tour the Incident response center, and if possible, observe the region's response during a drill or event.
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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-6.

Basic-Level Individual Study Activity

TOPIC: (ISA-7) The Enforcement Program

PURPOSE: The purpose of this activity is to provide you with an overview of the NRC 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.

COMPETENCY AREAS: REGULATORY FRAMEWORK
ENFORCEMENT

LEVEL OF EFFORT: 17 hours

REFERENCES:

1. Enforcement-related information found on the Enforcement Web page of the NRC public Web site, including the NRC enforcement policy, the enforcement manual, the enforcement program overview, and the enforcement process diagram
2. Regional policy guide for enforcement
3. "Writing Violations" course in iLearn

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 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.
9. Define escalated enforcement action.
10. Write a draft violation given case-specific facts.
11. Understand how to use the enforcement process diagram to disposition violations.
12. Describe what predecisional 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 of the different types of Orders and when they are used.

TASKS:

1. Locate the Enforcement Web page on the NRC public Web site. (Hint: Look under How We Regulate.)
2. Read the enforcement program overview included on the Enforcement Web page of the NRC external Web site.
3. Read the enforcement process diagram on the Enforcement Web page of the NRC external Web site.
4. Locate the enforcement manual on the Enforcement Web page of the NRC external 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 No. ML003777558).
6. Locate the most recent escalated enforcement action for a power reactor on the Enforcement Web page of the NRC external Web site and review the transmittal letter and attached notice of violation.
7. Review your region or office's guidance on implementing the enforcement policy.

8. Go to [iLearn](#) and complete the course on “Writing Violations.” Follow the guidance in the course to draft violations for the three sets of facts presented in the course.
9. Meet with the enforcement specialist in your region or office to review the draft violations you developed as part of the “Writing Violations” course, and discuss the current enforcement guidance.
10. 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: Obtain your supervisor’s signature in the line item for 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 OI by providing technical support. This individual study activity will help you understand the role of OI, how it functions, and what your responsibilities will be if you are assigned to assist OI during the conduct of an investigation.

COMPETENCY AREAS: INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. MD 9.8, "Organization and Functions, Office of Investigations"
2. Regional or OI Director
3. OI Web page on the NRC external Web site
4. NRC OI on internal NRC Web site

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the purpose and function of 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 MD 9.8
2. Study the OI 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 to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-8.

Basic-Level Individual Study Activity

TOPIC: (ISA-9) Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page

PURPOSE: The purpose of this study activity is for you to obtain a broad overall knowledge of the operating reactor inspection program and to an available resource you might find useful as an inspector. Upon completion of this study activity, you will have the necessary background to go into a more detailed study of the inspection program, and learn the specifics of what an inspector does, why it is done, and how it is done.

COMPETENCY AREAS: INFORMATION TECHNOLOGY
INSPECTION
COMMUNICATION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 34 hours

REFERENCES: For power reactor inspectors only:

1. NUREG-1649, "Reactor Oversight Process."
2. NRC Inspection Manual Chapter (IMC) 2515. "Light Water Reactor Inspection Program - Operating Phase"
3. IMC 0612, "Power Reactor Inspection Reports"
4. IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"
5. IMC 0305, "Operating Reactor Assessment Program"
6. Reactor Oversight Program internal Web page

For research and test reactor inspectors only:

1. IMC 2545, "Research and Test Reactor Inspection Program"

2. IMC 0615, "Research and Test Reactor Inspection Reports"

For power reactor inspectors and research and test reactor inspectors:

1. IMC 0300, "Announced and Unannounced Inspections"
2. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
3. IMC 0620, "Inspection Documents and Records"
4. NUREG/BR-0326, "NRC Inspector Field Observation Best Practices"
(on the ROP Digital City Web site)

**EVALUATION
CRITERIA:**

After completing this study activity, you will demonstrate your understanding of the Operating Reactor Inspection Program by successfully doing the following:

1. State when the NRC starts implementing the operating inspection program at a site and how long it remains in effect.
2. State the seven safety cornerstones and their purpose. (For power reactor inspectors only.)
3. Define the relationship of cornerstones to strategic arenas. (For power reactor inspectors only.)
4. State the three major program elements of the Operating Reactor Inspection Program and their specific functions. Identify how often resources are assigned to each program element. (For power reactor inspectors only.)
5. Compare and contrast a "smart" sample and a random sample. Explain why the "smart" sample is more appropriate for the ROP. (For power reactor inspectors only.)
6. State the criteria for declaring that an inspection is complete.
7. State the purpose of providing an inspection-hours estimate in each procedure.
8. State the purpose and content of inspection reports.
9. State the general policy regarding an inspector's review and handling of non-NRC generated documents.

10. State the policy for announced and unannounced inspections and for controlling major inspection activities at a licensee's site.
11. Describe the characteristics of a "major" inspection activity and state the limitations as to how many can be performed during a specified time limit. (For power reactor inspectors only.)
12. Describe in general terms the implementation of the NRC operating reactor assessment program. (For power reactor inspectors only.)

NOTE: you can obtain all inspection documents identified below from the Electronic Reading Room on the NRC Website.

TASKS:

1. Locate the applicable inspection guidance, either IMC 2515, "Light-Water Reactor Inspection Program—Operations Phase," and its appendices A, B, C, and D or IMC 2545, "Research and Test Reactor Inspection Program." Read the appropriate IMC in detail and scan the appendices to become aware of the organization of the operating inspection program, including its major parts.
2. Locate NUREG-1649, "Reactor Oversight Process." (For power reactor inspectors only.) Read the NUREG to become aware of the concept of the Reactor Oversight Program, its parts, and how it is implemented through IMC 2515.
3. Locate IMC 0612, "Power Reactor Inspection Reports" (for power reactor inspectors only) or IMC 0615, "Research and Test Reactor Inspection Reports" (for research and test reactor inspector only). Read the appropriate manual chapter to obtain a general understanding of the objectives of an inspection report, become familiar with the terminology, definitions, and format of an inspection report, and have a general understanding of how inspection findings are addressed.
4. Locate IMC 0330, "Guidance for NRC Review of Licensee Draft Documents," and IMC 0620, "Inspection Documents and Records." Scan the two manual chapters to obtain a general knowledge of the types of documents that will be encountered during an inspection and the NRC policy regarding how these documents should be handled.
5. Locate IMC 0300, "Announced and Unannounced Inspections," and IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites." (For power reactor inspectors only.) Scan the applicable

manual chapter(s) to determine the difference between announced and unannounced inspections and when each is used.

6. Locate IMC 0305, "Operating Reactor Assessment Program." (For power reactor inspectors only.) 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.
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.
8. Open your Web browser. Locate the ROP Web page on the NRC internal Web site. The reactor oversight process is a program that is supported by NRR.
9. Find the ROP blank feedback form (ROP Digital City > Communications and Training). Internal stakeholders use this form to send comments to NRR (the program office) about the ROP process and procedures. Talk with an experienced inspector about the process of submitting a feedback form. If the opportunity is available, work with an experienced inspector as he/she completes a feedback form.
10. Locate the Program Points of Contact section. Review the list of staff from the Reactor Inspection and Performance Assessment Branches in NRR and their specific Reactor Oversight Program areas of responsibility.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-9.

Basic-Level Individual Study Activity

TOPIC: (ISA-10) Performance Indicator Program

PURPOSE: The purpose of this activity is to introduce you to performance indicators.

**COMPETENCY
AREAS:** REGULATORY FRAMEWORK

**LEVEL OF
EFFORT:** 4 hours

REFERENCES:

1. IMC 0608, "Performance Indicator Program"
2. IMC 0308, Attachment 1, "Technical Basis for Performance Indicators"
3. NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines" (available at ROP Digital City)
4. IP 71150, "Discrepant or Unreported Performance Indicator Data"
5. IP 71151, "Performance Indicator Verification"
6. NRC performance indicators web page (available at ROP Digital City)

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the performance indicator (PI) program by successfully addressing the following:

1. State the purpose of the NRC's PI program.
2. Describe the seven safety cornerstones and cite one or more examples of PIs in each area.
3. Discuss the voluntary nature of the program and the challenges this presents.
4. Describe how NEI 99-02 and frequently asked questions (FAQs) are used and how PI questions are resolved.
5. Describe the content of the performance indicators web page and explain the regulatory impact/implications of non-green indicators.
6. Describe the purpose and content of IPs 71151 and 71150.

7. Describe the sequence of events following an inspectors' identification of a reporting error while conducting an IP 71151 inspection (including the interface with the NRC enforcement program).

TASKS:

1. Read IMC 0608, "Performance Indicator Program."
2. Read IMC 0308, Attachment 1, "Technical Basis for Performance Indicators."
3. Review the NRC performance indicators web page.
4. Review IPs 71151 and 71150.
5. Scan the introduction of NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines."
6. Attend or listen to the FAQ portion of a public monthly ROP meeting to observe the FAQ process.
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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-10.

Basic-Level Individual Study Activity

TOPIC: (ISA-11) Augmented Inspection Team, Special Inspection Team, and Incident Inspection Team Activities

PURPOSE: The purpose of this activity is to familiarize you with the actions taken by the NRC in response to incidents that do not require activation of the NRC Incident Response Plan. As a fully qualified inspector, you may be assigned to either an augmented inspection team (AIT), a special inspection team (SIT), or an incident inspection team (IIT) inspection activity. This individual study activity will help you understand how the NRC implements this program, what your responsibilities will be if you are assigned to a team, what the differences are between an AIT, SIT and IIT, and how this program differs from the NRC Incident Response Program.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. MD 8.3, "NRC Incident Investigation Program"
2. IP 71153, "Followup of Events and Notices of Enforcement Discretion"
3. IP 93800, "Augmented Inspection Team"
4. IP 93812, "Special Inspection"
5. IMC 0309, "Reactive Inspection Decision Basis for Reactors"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC AIT, SIT, and IIT inspection activities by successfully addressing the following:

1. State the purpose of the NRC Incident Investigation Program.
2. Describe an AIT and its purpose.
3. Describe an SIT and its purpose.
4. Describe an IIT and its purpose.
5. Describe how the Incident Investigation Program is different from the Incident Response Program.

TASKS:

1. Review MD 8.3, which you can find on the NRC internal Web site.
2. Explore all aspects of the Incident Investigation Program presented on the NRC internal Web site.
3. Review your region or office's guidance on AIT, SIT, and IIT activities.
4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the answers to the questions listed under the evaluation criteria.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-11.

Basic-Level Individual Study Activity

TOPIC: (ISA-12) 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 and inspectors should be familiar with the direction-setting and policymaking activities of the Commission.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES: NRC external Web sites

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

1. Locate Commission-related documents on the internal and external agency Web sites.
2. Discuss how the Commission uses staff requirements memoranda to direct the staff.

TASKS:

1. Read about the Commission's direction-setting and policymaking activities under Policymaking.
2. Read about the different kinds of decision documents issued by the Commission.
3. Find and read Chairman Meserve's speech given on December 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 to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-12.

Basic-Level Individual Study Activity

TOPIC: (ISA-13) Organization and Content of the NRC Inspection Manual

PURPOSE: The purpose of this activity is to introduce you to the content and organization of the NRC Inspection Manual and how it relates to inspection programs, particularly the Operating Reactor Inspection Program. As an inspector, you will be following an inspection program that is defined by a manual chapter and implemented by its associated inspection procedures. This study activity will help you identify and locate inspection procedures that are used in the operating 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 establishing policy that will govern some of your actions in implementing the inspection program.

COMPETENCY AREAS: REGULATORY FRAMEWORK
INSPECTION

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NRC internal home page (Program Office—NRR)
2. IMC 0040, "Preparing, Revising and Issuing Documents for the NRC Inspection Manual"
3. IMC 9900, "Technical Guidance"

EVALUATION CRITERIA: After completing this activity you will demonstrate your understanding of the content and organization of the NRC Inspection Manual, as well as 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. IMC 9900 technical guidance
 - i. technical guidance
 - ii. 10 CFR guidance
 - e. 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 NRC Web site.

TASKS:

1. Locate IMC 0040 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 CFR 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 titled, "Technical Guidance."
6. Scan the titles of the individual guidance documents.
7. Read the inspection procedures that apply to your inspector area.
8. Meet with your supervisor or an experienced inspector to discuss two reactor facility issues that could involve use of the technical guidance contained in IMC 9900. Discuss the limitations that are associated with applying the guidance contained in the inspection procedures.
9. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-13

Basic-Level Individual Study Activity

TOPIC: (ISA-14) 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 that these items are addressed by the proper regulatory authority, the NRC has established agreements, called memoranda of understanding (MOUs), 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:

1. IMC 1007, "Interfacing Activities between Regional Offices of NRC and OSHA" (Note: Research and test reactor inspectors should use this guidance as applicable.)
2. Management Directive 5.2, "Cooperation With States at Commercial Nuclear Power Plants and Other Nuclear Production or Utilization Facilities"
3. Regional or office guidance (if applicable)

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

1. Locate the active MOUs used to coordinate between the NRC and other Federal 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 reactor

facility. Be able to state where the guidance for these actions is provided.

4. Explain how an inspector interacts with state and federal agencies, and with state inspectors who request to observe or participate in an NRC inspection.
5. 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. You can find electronic versions of these documents on the NRC internal Web site under Enforcement.
2. Review the MOUs to develop a general understanding of the agreements between the NRC and 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 with 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 to discuss two reactor facility issues that involved interface with other Federal or State agencies. Discuss how the agency addressed the issues 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 to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-14.

Basic-Level Individual Study Activity

TOPIC: (ISA-15) Interaction with the Public

PURPOSE: The purpose of this activity is to acquaint you with the expectations of NRC inspectors when dealing with members of the public. Responsiveness and openness are essential to the agency's ability to fulfill its goal of enhancing openness. As a qualified inspector, you will have many opportunities to interact with the public. This individual study activity will help you understand NRC procedures, policies, and available resources related to interaction with the public.

COMPETENCY AREAS: COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. NUREG/BR-0215, "Public Involvement in the Nuclear Regulatory Process," Revision 2
2. NUREG/BR-0297, "NRC Public Meetings"
3. MD 3.4, "Release of Information to the Public"
4. MD 3.5, "Public Attendance at Certain Meetings Involving the NRC Staff"
5. MD 8.11, "Review Process for 10 CFR 2.206 Petitions"
6. NRC internal Web page, Communication and Public Meetings
7. Regional or office guidance related to interaction with the public (e.g., conduct of public meetings, response to inquiries from the public, release of information to the public)

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of proper interaction with the public by successfully addressing the following:

1. Describe the expectations of NRC employees regarding answering telephone calls that involve inquiries from a member of the public.
2. 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
3. Describe what is meant by "Plain Language." Identify where examples and guidance related to plain language can be found.
4. Explain what a "2.206 petition" is. Describe how it is handled by the NRC.
5. Describe how other public inquiries, including "nonallegations," are handled in your office.
6. 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.
7. Identify what types of NRC meetings are generally open to the public. List some that are not usually open to the public.
8. Describe how members of the public can find out about NRC public meetings. Discuss the expectations on timeliness of meeting notices and summaries.
9. Describe the restrictions regarding the release of information to the public, including specific types of information that are not to be released.

NOTE: You may request NUREG references used in this activity that cannot be found on the NRC external Web site from your Public Affairs

TASKS:

1. Review the information presented by the NRC Public Affairs Office on interactions with the public that can be found on the NRC internal and external Web sites. Review the information available on the external NRC Web site related to general topics of interest to the public, such as the public involvement, school programs, and technical information papers.
2. Visit the NRC Plain Language Action Plan on the internal Web site, including some of the links to resource materials.

3. Visit the Communication and Public Meetings page on the NRC internal Web site. Review the public meeting policy and checklist.
4. Locate and review the material specifically listed in the reference section of this activity. The NRR Project Manager's Handbook and NUREG/BR-0200, "Public Petition Process," may also be beneficial in understanding the processing of 2.206 petitions and "ticketed items."
5. Review the steps in the rulemaking process on the NRC external Web site under How We Regulate.
6. Identify, locate, and review your region's policy guidance on the 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.
7. Meet with your supervisor and discuss what types of public interactions you are likely to encounter and ensure that you understand what you are to do. Discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-15.

Basic-Level Individual Study Activity

TOPIC: (ISA-16) Contacts with the Media

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 noncomplex manner within the limitations of agency guidance for the release of information to the public. Such communication supports one of the NRC's main objectives of increasing openness. 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

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NUREG/BR-0202, "Guidelines for Interviews with the News Media"
2. MD 3.4, "Release of Information to the Public"
3. NUREG/BR-0224, "Guidelines for Conducting Public Meetings"
4. NUREG-1614, Vol 4, "Strategic Plan: Fiscal Years 2008 - 2013"
5. NUREG/BR-0308, "Effective Risk Communication"
6. Regional or office instructions establishing the policy and process for receipt of inquiries from the public/media.

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 good communication with the media contributes to its achievement.
2. Identify the importance of communicating with the media in a manner to build trust.
3. Discuss the importance of agency goals, onsite inspection staff, the agency's safety focus, risk-informed policies, trustworthiness, and limitations on particular subject knowledge with regard to communicating with the media.

4. Discuss the importance of planning ahead and preparing well for communicating with the media.
5. Discuss the importance of controlling your speech, including what words not to 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.
6. 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.

NOTE: You may request any NUREG references used in this activity that cannot be found on the NRC external Web site from your PAO.

TASKS:

1. Meet with the regional Public Affairs Officer or someone from the Office of Public Affairs at Headquarters to discuss the guidelines for interviews with the news media.
2. Explore all aspects of the importance of appropriate, accurate, and clear communications with the public as found on the NRC Web site.
3. Review the agency guidance on how to communicate with the public/media.
4. 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: Obtain your supervisor’s signature in the line item for Basic-Level Certification Signature Card Item ISA-16.

Basic-Level Individual Study Activity

TOPIC:	(ISA-17) Institute of Nuclear Power Operations, Nuclear Energy Institute, and National Organization of Test, Research and Training Reactors
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), the Nuclear Energy Institute (NEI), or the National Organization of Test, Research and Training Reactors (TRTR). In addition, this activity will familiarize you with the proper conduct when INPO or TRTR is at a facility. Most of this guidance relates to INPO and NEI. However, you should apply it to TRTR, as appropriate.
COMPETENCY AREAS:	REGULATORY FRAMEWORK SELF-MANAGEMENT
LEVEL OF EFFORT:	1 hour
REFERENCES:	<ol style="list-style-type: none">1. Memorandum of Agreement Between NRC and INPO (ML073460015)2. IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"3. IMC 0612, "Power Reactor Inspection Reports"4. OEDO Procedure 0220, "Coordination with the Institute of Nuclear Power Operations (INPO)" (available on the NRC internal Web site under OEDO and then Procedures and Guidance)
EVALUATION CRITERIA:	<p>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, NEI, or TRTR documentation and when conducting an inspection when INPO or TRTR is at a facility by discussing the following:</p> <ol style="list-style-type: none">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.

4. Explain the policy for reviewing INPO operating experience (OE) reports during inspection activities.

TASKS:

1. Review IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"
2. Review the section in IMC 0612 on third-party reviews.
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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-17.

Basic-Level Individual Study Activity

TOPIC: (ISA-18) The 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 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 openness. This study activity will provide you with information on the implementation of the guidance on responding to FOIA requests from the public.

COMPETENCY AREAS: COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. 10 CFR Part 9, "Public Records"
2. MD 3.1, "Freedom of Information Act"
3. MD 3.2, "Privacy Act"
4. MD 3.4, "Release of Information to the Public"
5. IMC 0620, "Inspection Documents and Records"
6. 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 associated with FOIA and the Privacy Act 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 a 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 before their release to ensure that withholdable information is properly marked before forwarding to Headquarters
 - d. support the decision to withhold information by providing the appropriate exemption and "foreseeable harm" statements
4. Identify the type of information that should be withheld from release when responding to a FOIA request, including proprietary, predecisional, 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.
7. Discuss the consequences associated with maintaining unnecessary copies of licensee documents.

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 Web site and within ADAMS.
3. Review the agency guidance on how to implement FOIA without releasing predecisional 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 to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-18.

Basic-Level Individual Study Activity

TOPIC: (ISA-19) 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 opportunities to communicate issues with licensees. Besides communicating effectively, inspectors, as Government officials, have additional requirements to follow during entrance and exit meetings to ensure that proprietary data and safeguarded information are not disclosed and that information is shared with the public when appropriate. To ensure that issues are discussed in accordance with NRC requirements, the agency has established communication standards 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 AREAS: COMMUNICATION
TEAMWORK
INSPECTION

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. IMC 2515, "Light-Water Reactor Inspection Program—Operations Phase"
2. IMC 0620, "Inspection Documents and Records"
3. Regional or office guidance (if applicable)

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

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 2515 and regional or office instructions.
2. Observe at least one entrance and exit meeting conducted at a reactor site. If possible, observe meetings that have been

conducted for a wide range of inspection activities in a variety of locations, 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 to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-19.

Basic-Level Individual Study Activity

TOPIC: (ISA-20) 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 that 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.

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

LEVEL OF EFFORT: 20 hours

REFERENCES:

1. IMC 0612, "Power Reactor Inspection Reports" (for power reactors), or IMC 0615, "Research and Test Reactor Inspection Reports" (for research and test reactors)
2. IMC 0612, Appendix B, "Issue Screening"
3. IMC 0620, "Inspection Documents and Records"
4. "Plain Language Initiative" Web site, which references NUREG-1379 for editorial style guidance, the directives from the President of the United States, and other related documents
5. <http://www.internal.nrc.gov/NRC/PLAIN/index.html>
6. Regional or office guidance (as applicable)

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

1. Locate various guidance for preparing NRC inspection reports.

2. Verify that an inspection report was written in accordance with the applicable NRC guidance.
3. Explain the threshold for documenting licensee- and NRC-identified issues in NRC inspection reports.
4. Define inspection working files and indicate what should be captured in ADAMS, ultimately destroyed, or referenced in the inspection report.

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. Locate and read the various guidance for documenting violations. The necessary information will be contained in NRC manual chapters and regional or office instructions.
3. Review flow charts in Figure 1, 2, and 3 of IMC 0612, Appendix B and understand when an issue is documented in the following categories: an unresolved item, a violation for which enforcement discretion is exercised, a traditional enforcement violation, a finding with a cross-cutting aspect, and as a licensee-identified non-cited violation in Section 4OA7.
4. Select recently completed inspection reports prepared in your region or office that contain: 1) an NRC-identified finding, 2) an NRC-identified violation, and 3) a licensee-identified violation. Compare the inspection report format and content to the report preparation guidance contained in either NRC IMC 0612 or IMC 0615 and to any applicable regional or office guidance. Through review of the guidance, as well as conversations with the report author, verify that the report was prepared in accordance with the requisite report preparation 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-20.

Basic-Level Individual Study Activity

TOPIC: (ISA-21) Open, Collaborative Working Environment & Ways to Raise Differing Views

PURPOSE: The purpose of this activity is to communicate expectations for establishing and maintaining an open, collaborative working environment and to provide guidance on the informal and formal processes for pursuing resolution of differing views that are directly related to the NRC's mission. The NRC strives to establish and maintain an open, collaborative working environment (OCWE) that encourages all employees and contractors to promptly voice differing views without fear of retaliation. At the NRC, we encourage trust, respect, and open communication to foster and promote a positive work environment that maximizes the potential of all individuals and improves our regulatory decision-making. We expect individuals to be NRC Team Players. In addition to informal discussions, which should be sufficient to resolve most issues, individuals have various mechanisms for expressing and having their differing views heard by decision-makers, including the Open Door Policy, the Non-Concurrence Process (NCP), and the Differing Professional Opinions (DPO) Program. This activity will provide you with an understanding of the expected behaviors for being an NRC Team Player that support an OCWE and key features of the Open Door Policy, the NCP, and the DPO Program.

COMPETENCY AREAS: INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 2 hours

REFERENCES:

1. OCWE web site <http://www.internal.nrc.gov/OE/ocwe/index.html>
2. NCP web site: <http://www.internal.nrc.gov/OE/nonconcur/index.html>
3. DPO Program web site:
<http://www.internal.nrc.gov/OE/dpo/index.html>
4. MD 10.160, "Open Door Policy"
5. Draft MD 10.158, "NRC Non-Concurrence Process"
6. MD 10.159, "The NRC Differing Professional Opinions Program"
7. Regional or office instructions establishing additional implementing guidance for raising differing views (if applicable)

**EVALUATION
CRITERIA:**

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC Open, Collaborative Working Environment & Ways to Raise Differing Views Program by successfully addressing the following:

1. State the expectations for an OCWE and behaviors for being an NRC Team Player.
2. Describe the Open Door Policy.
3. Describe the key features of the NCP.
4. Describe the key features of the DPO Program.
5. Discuss under what circumstances the various methods available for expressing differing views would be used.
6. Describe where summaries of closed DPOs are published and where DPO Program reviews are available.
7. Identify who your office's Differing Views Office Liaison is.

TASKS:

1. Attend a seminar (if possible) on an Open, Collaborative Working Environment & Ways to Raise Differing Views, or review seminar slides.
2. Explore information and guidance for OCWE, Open Door Policy, NCP, and DPO Program on identified web sites.
3. Review MD 10.160, draft MD 10.158, and MD 10.159.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-21.

Basic-Level Individual Study Activity

TOPIC: (ISA-22) Overview of 10 CFR Part 50 for Power Reactors

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the construction and operation of a nuclear power reactor. This individual study activity will help you to understand the content of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," and how to locate the specific requirements for any subject. Regulatory requirements for research and test reactor inspectors are addressed in a similar manner in ISA-RT-2 found in IMC 1245 Appendix C-5.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC internal home page
2. Paper copy of the latest revisions to 10 CFR Parts 1 through 50

EVALUATION CRITERIA: Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of the general content of 10 CFR Part 50 by successfully discussing the following:

1. State the purpose of 10 CFR Part 50.
2. Given a specific subject, identify which section in 10 CFR Part 50 discusses the requirements for that subject by using the search feature on the NRC Regulations and Nuclear Regulatory Legislation Web pages.
3. Discuss the general content of the information covered by the 10 CFR Part 50 quiz and the answers to the quiz to gain an understanding of the key portions of 10 CFR Part 50.

TASKS:

1. Become familiar with, and be able to use, the search feature to locate the information available in NRC Regulations and Nuclear Regulatory Legislation Web pages found on the NRC internal Web site.
2. Power reactor inspectors, read and be familiar with the following parts of Part 50:
50.2, 50.7, 50.9, 50.12, 50.30, 50.34, 50.36, 50.39, 50.49, 50.51,

50.54, 50.59, 50.65, 50.67, 50.71, 50.72, 50.73, 50.120, and Appendices A, B, and R.

3. Complete the 10 CFR Part 50 quiz to gain an understanding of the key portions of 10 CFR Part 50. This self-study, open-book quiz is located in ROP Digital City on the internal NRC Web site. Since this is an ungraded self-study activity, you will also find the answers and associated references on Digital City. Be sure to complete the quiz before you print the answer sheet.
4. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-22.

Basic-Level Individual Study Activity

TOPIC: (ISA-23) Overview of 10 CFR Part 19 and 10 CFR Part 20

PURPOSE: The purpose of this activity is to familiarize you with 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," and 10 CFR Part 20, "Standards for Protection against Radiation." These regulations are generic to any position within the agency and will provide a perspective on conducting inspections in the working environment of a nuclear reactor. This individual study activity will help you understand the purpose of 10 CFR Part 19 and 10 CFR Part 20 and provide you with some basic knowledge that all NRC inspectors will use when conducting inspections in radiologically controlled areas.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC internal Web page—Information Resources—Regs (10 CFR) NRC Maintained—Parts 19 and 20
2. A hard copy of 10 CFR Part 19 and 10 CFR Part 20

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of 10 CFR Part 19 and 10 CFR Part 20 and why these regulations are important for all inspectors by successfully addressing the following:

1. Describe the general purpose of 10 CFR Part 19.
2. Identify the section of 10 CFR Part 19 that describes the rights of radiation workers if they believe a violation of radiological working condition requirements has occurred.
3. Identify the section of 10 CFR Part 19 that requires a licensee to report doses to workers.
4. Describe the purpose of 10 CFR Part 20.
5. Identify the relevant section of 10 CFR Part 20 and discuss the various radiological circumstances that would require a licensee to notify the NRC.
6. Discuss why it is important for every NRC inspector to have a general understanding of 10 CFR Part 19 and 10 CFR Part 20.

TASKS:

1. Review 10 CFR Part 19 for a general understanding of the following:
 - a. the purpose of 10 CFR Part 19 (19.1)
 - b. requirements for document postings (19.11(d) and (e))
 - c. requirements for promptly identifying any condition that may cause unnecessary exposure (19.12(a)(4))
 - d. Instructions for individuals in a restricted area that may experience unnecessary exposure to radiation and/or radioactive materials (19.12(a)(5))
 - e. the times the NRC is allowed to inspect a facility (19.14(a))
 - f. requests by workers for an NRC inspection (19.16(a))
2. Review 10 CFR Part 20 for a general understanding of the following:
 - a. the purpose of 10 CFR Part 20 (20.1001)
 - b. occupational dose limits for adults (20.1201)
 - c. occupational dose limits for members of the public (20.1301)
 - d. concepts of ALARA (20.1101)
 - e. conditions requiring individual monitoring of external and internal occupational dose (20.1502)
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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-23.

Basic-Level Individual Study Activity

TOPIC: (ISA-24) 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 for which the licensee is in noncompliance. Inspectors must also 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:**
1. Improved standard technical specifications or technical specifications for a specific research and test reactor, as applicable
 2. NUREG-800, "Standard Review Plan," for power reactor inspectors or NUREG-1537, Part 2, "Standard Review Plan and Acceptance Criteria, Guidelines for Preparing and Reviewing Applications of Non-Power Reactors," for research and test reactor inspectors
 3. NRC RG 1.33, "Quality Assurance Program Requirements (Operations)"
 4. NRC RG 1.70 or NUREG-1537, Part 1, "Format and Content Guidelines for Preparing and Reviewing Applications of Non-Power Reactors," as applicable
 5. Updated final safety analysis reports (UFSARs) (any available) or research and test reactor safety analysis reports (SARs), as applicable
 6. Facility-specific license (any available)
 7. Facility-specific safety evaluation reports (SERs) (any available)

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. Identify the regulatory enforcement hierarchy that exists between CFR requirements, a facility-specific license, facility-specific technical specifications, a facility-specific UFSAR and SER, and facility-specific procedures.
2. Recognize how the NRC Standard Review Plan is related to the documents identified in No. 1 above.
3. Identify which organization writes safety analyses, which organization approves them, and which organization is required to maintain current copies.
4. Identify the organization responsible for writing RGs and SERs and the organization responsible for approving them. Describe the requirements for maintaining current copies.
5. Discuss how enforcement actions relate to SARs or an SER.
6. Locate where the following can generally be found:
 - a. safety limits (facility specific)
 - b. design-basis accident analysis
 - c. maximum-licensed thermal power
 - d. limiting safety system settings (facility specific)
 - e. limiting conditions for operation (LCOs)
 - f. bases for LCOs
 - g. NRC criteria for accepting a safety analysis
 - h. licensee commitments to various standards
 - i. specific, but not necessarily all, approved methods for complying with NRC requirements
 - j. licensee security plan

TASKS:

1. Locate all applicable reference documents.
2. Meet with an appropriately qualified inspector and discuss the general objectives of a licensee security plan and any restrictions on public availability. Determine the specific security requirements to which an NRC inspector must personally adhere.
3. Discuss with your Office Enforcement Specialist your answers to the above questions related to enforcement policy.
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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-24.

Basic-Level Individual Study Activity

TOPIC: (ISA-25) Security Requirements for Nuclear Power Plants (For power reactor inspectors only, security requirements for research and test reactors are addressed in course G-106, "Research and Test Reactor Technology," chapter 5, which is a course required by IMC 1245 App C5.)

PURPOSE: The purpose of this activity is to provide you with a general understanding of the requirements for the security program at nuclear plants.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors against Radiological Sabotage"
2. NRC Regulatory Issue Summary (RIS) 2002-12a, Revision 1, "Power Reactors NRC Threat Advisory and Protective Measures System"
3. MD 12.6, "NRC Sensitive Unclassified Information Security Program"
4. 10 CFR 73.21, "Requirements for the Protection of Safeguards Information"
5. SECY-04-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the requirements for a security program at a nuclear plant by successfully doing the following:

1. Discuss how the site security force maintains access control of the owner-controlled, protected, and vital areas.
2. Discuss intrusion detection equipment.
3. Generally discuss the two threat levels and the corresponding actions for each level, as provided in RIS 2002-12a, Revision 1.
4. Explain the need for maintaining classification of certain material safeguards and the proper handling of the material. Discuss the Sensitive Information Screening Project review.

5. Discuss the responsibilities of escorting individuals inside protected and vital areas.

TASKS:

1. Complete the Information Security (INFOSEC) Awareness Training. To access the training, (1) select Training on the NRC's internal Web site, (2) select Web-Based Training on the Training Web page, and (3) select Information Security (INFOSEC) Awareness on the Web-Based Training Web page. Be sure to print the completion record at the end of the online course. You must present this to your supervisor as evidence that you have completed the course.
2. Obtain paper copies or locate and bookmark electronic locations of the above-stated reference material for personal use and future reference. Electronic copies can be found on the NRC external Web site in the Electronic Reading Room.
3. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
4. Review and discuss the evaluation criteria with your supervisor or a fully qualified inspector.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-25.

Basic-Level Individual Study Activity

TOPIC: (ISA-26) Exploring the Operating Reactor Assessment Program (for power reactor inspectors only)

PURPOSE: The purpose of this study activity is for you to obtain a broad overall knowledge of the operating reactor assessment program. Upon completion of this study activity, you will have the necessary background to initiate a more detailed study of the inspection program in which you will learn the specifics of what an inspector does, why it is done, and how it is done.

COMPETENCY AREAS: ASSESSMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 24 hours

REFERENCES:

1. NUREG-1649, "Reactor Oversight Process" (for power reactor inspectors only)
2. IMC 0612, "Power Reactor Inspection Reports"
3. IMC 0305, "Operating Reactor Assessment Program"
4. IMC 0308, Attachment 4, "Technical Basis for Assessment"
5. IMC 0310, "Components within Crosscutting Areas"
6. IMC 0320, "Operating Reactor Security Assessment Program"

EVALUATION CRITERIA: After completing this study activity, you will demonstrate your understanding of the Operating Reactor Assessment Program by successfully doing the following:

1. State the purpose of the Reactor Oversight Process.
2. State the purpose of mid-cycle and end-of-cycle assessment.
3. Explain when a Plant Performance Summary must be developed and what types of information are included in the plant performance summary as discussed in Sections 07.03.b (mid-cycle review preparation) and 07.04.b (end-of-cycle review preparation) of IMC 0305.

4. State the purpose of the action matrix and describe the five different plant performance designations.
5. Describe what a substantive crosscutting issue is and the criteria for its initiation.

TASKS:

1. Locate NUREG-1649 (for power reactor inspectors only). Read the NUREG to become aware of the concept of the assessment of plant performance and the NRC response.
2. Locate IMC 0305. Read IMC 0305 to gain an understanding of how the NRC assesses licensee performance and the actions the NRC takes for varying levels of licensee performance.
3. Locate IMC 0320. Scan IMC 0320 to gain an overview of how NRC assesses security issues.
4. Locate the Plant Assessment and Results link in ROP Digital City (introduced in ISA-2). Note there are two links—one for internal NRC use only and one for external use. State the major difference between the internal and external Web sites.
5. Locate the ROP Action Matrix Summary and the historical ROP Action Matrix Summaries. Discuss the information provided.
6. Attend several mid-cycle and end-of-cycle review meetings to gain an understanding of the purpose of the meetings, the information discussed, and the decisions made. You should attend those mid-cycle review meetings that will maximize your exposure to the assessment program. Whenever possible, attend a meeting that includes a discussion of crosscutting issues, a discussion of plant performance summary (Exhibit 7), and a discussion of safety significant findings and performance indicators.
7. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-26.

Basic-Level Individual Study Activity

TOPIC: (ISA-27) Generic Communications (for power reactor inspectors only)

PURPOSE: The purpose of this study activity is to become familiar with the different categories of generic communications, the appropriate uses of each type and the procedures associated with them.

COMPETENCY AREAS: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NRR Office Instruction LIC-503, "Generic Communications Affecting Nuclear Reactor Licensees"
2. NRR Office Instruction LIC-400, "Procedures for the Development of New and Revised Generic Requirements for Power Reactor Licensees"
3. Generic communication web page (<http://www.nrc.gov/reading-rm/doc-collections/gen-comm/>)

EVALUATION CRITERIA:

After completing this study activity, you will demonstrate your understanding of Generic Communications by successfully doing the following:

1. Describe the different kinds of generic communications and their purposes.
2. Describe what can and cannot be required in the specific types of generic communications.
3. For each type of generic communication, describe the procedures for their preparation, distribution, follow-up, and close out.
4. Describe the responsibilities of the major parties.
5. Describe the regulations involved in generic communications.

TASKS:

1. Review the references to understand the principles discussed in the evaluation criteria.
2. Identify with the supervisor and review a selection of recent Bulletins, Generic Letters, Information Notices, and Regulatory

Issue Summaries. As much as possible, topics should be pertinent to your position.

3. If possible, identify with your supervisor and read a selection of licensee's responses and follow-up regulatory actions.
4. Meet with the person designated to be a resource for this activity or supervisor and discuss the items listed in the evaluation criteria section.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-27

Basic-Level On-the-Job Activities

Basic-Level On-the-Job Activities

The on-the-job training (OJT) activities require you to conduct inspection-related work, under supervision, at a reactor facility. They are designed to allow you to observe and perform key inspector tasks under controlled circumstances. Like the individual study activities, each of the OJT activities 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.

Before beginning the activities in this section, you must successfully complete the course work for site access. You can do this in one of two ways. You can complete the NRC 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.

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 to be 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 an OJT activity before you meet with your supervisor for evaluation.

Basic-Level On-the-Job Activity

TOPIC: (OJT-1) Facility Familiarization Tour with a Qualified Inspector

PURPOSE: The purpose of this activity is to (1) acquaint you with the general layout of a facility and identify various major equipment, (2) instruct you in the types of industrial and radiological personal protection requirements and the proper method of complying with these requirements, (3) instruct you in the use of security procedures, and (4) instruct you in the proper response to an emergency if the emergency is declared while you are in the facility.

**COMPETENCY
AREAS:**

INSPECTION
COMMUNICATION
FUNDAMENTAL PLANT DESIGN AND OPERATION
EMERGENCY RESPONSE

NOTE: Completion of this activity may require several facility tours.

**LEVEL OF
EFFORT:**

32 hours

REFERENCES:

1. Licensee drawing(s) of the site building layouts
2. Industrial safety courses in iLearn

**EVALUATION
CRITERIA:**

Upon completion of this activity, you will be asked to demonstrate your understanding of the general plant layout and inspector behavior in the plant 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.
2. Identify the types of industrial personnel safety equipment that are available and the circumstances under which each piece of equipment should be used.
3. Explain how you would know what type(s) of radiological protection equipment are required before entering a radiologically controlled area (RCA).
4. Given specific scenarios related to security situations, describe what actions you would take.

5. Given specific scenarios related to emergency response situations, describe what actions you would take.
6. Given specific scenarios related to health physics situations, describe what actions you would take.

TASKS:

1. Review a drawing(s) of the building layout for the site and plan a route for a tour that will include the major areas on the site, such as the following:
 - a. turbine building (for power reactor inspectors) or experimental facilities (for research and test inspectors)
 - b. engineered safeguards equipment areas
 - c. RCA
 - d. emergency response facility
 - e. control room
 - f. spent fuel pool
 - g. switchyard or electrical distribution system
 - h. diesel generator rooms or other emergency power supplies
 - i. other areas deemed appropriate by a qualified inspector
2. Complete the industrial safety courses in iLearn. Before the tour, discuss the requirements for personal industrial safety equipment with a qualified inspector.
3. Tour the facility with a qualified inspector and locate the major pieces of equipment and facility areas, including but not limited to, those items described above.
4. Enter the RCA with a qualified inspector and tour the area to observe and/or discuss items such as different radiological control postings, methods of designating areas that have additional radiological control requirements for entry, different radiological control clothing requirements for different areas, use of portal monitors and personal friskers, and monitoring personal dosimetry.
5. During the tour, discuss the proper security procedures for entering the areas discussed above, including the actions to take in the event a procedure error or violation of security rules is committed or observed.
6. During the tour, discuss the proper response in the event an emergency is declared while in the facility.
7. During the tour, discuss the proper response in the event of a radiological control event or anomaly.

8. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-1.

Basic-Level On-the-Job Activity

TOPIC: (OJT-2) Control Room Tour with Resident or Other Qualified Inspector

PURPOSE: The purpose of this activity is to familiarize you with the appropriate protocol for the conduct of an inspector in a control room. This activity will also help you to become familiar with general control room layout, required control room staffing, and the inspector's role in gathering facility status information.

COMPETENCY AREAS: SELF-MANAGEMENT
INSPECTION
FUNDAMENTAL PLANT DESIGN AND OPERATION
EMERGENCY RESPONSE

LEVEL OF EFFORT: 3 hours

REFERENCE: 1. Licensee-specific procedure for the conduct of operations in the control room

EVALUATION CRITERIA: Upon completion of this activity, you should be able to do the following:

1. Explain the appropriate protocol for an inspector's conduct in the control room.
2. Explain how you would respond if you were present in the control room during an emergency situation. Specifically, you should explain why it is never appropriate for an inspector to operate any controls or to interfere in licensee operations during routine or emergency situations.
3. Describe the general layout of a control room. Explain what is meant by "at the controls" in a control room or explain where an operator(s) must be stationed in the control room during operations. Describe examples of site-specific restrictions for limits on where an inspector may go in a control room, with or without permission.
4. Describe the basic staffing in the control room and where you would expect to find various licensed personnel.
5. Describe the types of information an inspector gathers in the control room and how that information is obtained.

TASKS: 1. Locate and read appropriate sections of the site-specific guidance for control of operations in the control room.

2. Discuss site-specific guidance, as it relates to protocol for conduct of NRC personnel in the control room, with an inspector. Discuss how this guidance could vary from site to site.
3. Go to the control room with an inspector and observe appropriate protocol. Gain a general understanding of the control room layout and staffing. Also, observe the inspector gathering facility status information.
4. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-2.

Basic-Level On-the-Job Activity

TOPIC: (OJT-3) Licensee Plan-of-the-Day Meeting, Documents, or Information (for power reactor inspectors only)

PURPOSE: The purpose of this activity is to (1) acquaint you with the various types of information discussed in the plan-of-the-day (POD) meeting, (2) instruct you in the types of information provided in the POD that is important to an inspector, and (3) inform you of the appropriate inspector protocols so that you will know when NRC participation is and is not appropriate.

COMPETENCY AREAS: INSPECTION
COMMUNICATION
SELF-MANAGEMENT

LEVEL OF EFFORT: 2 hours

REFERENCES: None

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC inspector's role at the POD by successfully discussing the following:

1. Identify the types of information discussed in the POD that are important to an inspector and discuss why the information is important.
2. Given specific examples, discuss whether it is appropriate for an inspector to participate in the discussion at or about the POD.

TASKS:

1. Discuss with a qualified inspector the types of information provided at the meeting or in a POD document that would be important to you and why that information would be important.
2. Discuss with a qualified inspector the protocols of when an NRC inspector should and should not participate in the licensee's discussions.
3. Review the licensee's overview organization chart and either observe a POD meeting with a qualified inspector or review a POD document with a qualified inspector.
4. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-3.

Basic-Level On-the-Job Activity

TOPIC: (OJT-4) Inspection Activities

PURPOSE: The purpose of this activity is to familiarize you with inspection tasks commonly performed by an inspector. This OJT will prepare you to independently plan and conduct the baseline inspection program, as defined in the applicable IMC.

COMPETENCY AREAS: INSPECTION
COMMUNICATION
TEAMWORK
SELF-MANAGEMENT

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 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:

1. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
2. IMC 2515, "Light Water Reactor Inspection Program—Operations Phase" or IMC 2545, "Research and Test Reactor Inspection Program"
3. NUREG-1649, "Reactor Oversight Process" (for power reactor inspectors only)
4. UFSARs or SARs for activity to be inspected
5. Inspection planning guidance (For research and test reactor inspectors see IMC 0615 and IMC 2545)

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the baseline inspection process by doing the following:

1. Describe the contents and purpose of the site-specific inspection plan.
2. Describe the purpose of the inspection planning call.
3. Provide your supervisor with a specific inspection plan that you have prepared. Describe the purpose and contents of a specific

inspection plan.

4. Discuss the documents to be reviewed, including their content and purpose, before an inspection.
5. Describe the contents and purpose of the part of the entrance meeting you conducted.
6. Describe the activities you accomplished during the inspection(s) and their purpose.
7. Describe the purpose of the management brief and the exit prebrief of licensee management in which you participated.
8. Describe the contents and purpose of the part of the exit meeting you conducted.

TASKS:

1. Review the annual or applicable site-specific inspection plan to understand how your inspection effort fits into the overall plan.
2. Participate in an inspection planning call to the licensee.
3. Participate in developing the inspection-specific plan.
4. Review the following documents to understand how they provide background information, current issues, and areas for emphasis and support for the inspection effort you plan to accomplish:
 - a. previous inspection reports.
 - b. plant issues matrix (for power reactor inspectors only)
 - c. appropriate licensee documents
 - d. applicable inspection procedures
 - e. other applicable documents (e.g., performance indicators, licensee event reports, information notices, and bulletins)
5. Observe an entrance meeting.
6. Observe the activities performed by a qualified inspector during the completion of the planned inspection by doing the following:
 - a. observing implementation of inspection procedures
 - b. observing interviews/discussion with facility personnel
 - c. observing facility work activities
 - d. reviewing documentation and records
 - e. discussing inspection results with the lead inspector
7. Observe a briefing of NRC management.
8. Observe an exit prebrief of licensee management.

9. Observe an exit meeting.
10. Participate as an active member in an inspection by doing the following:
 - a. drafting a portion of the inspection-specific plan
 - b. conducting activities described in No. 6 above, as appropriate
 - c. as deemed appropriate by your supervisor, conducting a portion of the following:
 - i. the entrance meeting
 - ii. the briefing of NRC management.
 - iii. the prebrief of licensee management
 - iv. the exit meeting
11. 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: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-4.

Basic-Level On-the-Job Activity

TOPIC: (OJT-5) 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: 45 hours

NOTE: References, evaluation criteria and tasks related to the significance determination process (SDP) are for power reactor inspectors only.

- REFERENCES:**
1. IMC 0310 "Components within the Crosscutting Areas"
 2. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
 3. IMC 0609, "Significance Determination Process (SDP)" (for power reactor inspectors only)
 4. IMC 0609, Attachment 4 "Initial Characterization of Findings" (for power reactor inspectors only)
 5. IMC 0609, Appendix A "The SDP for Findings At-Power" (for power reactor inspectors only)
 6. IMC 0612, "Power Reactor Inspection Reports" or IMC 0615, "Research and Test Reactor Inspection Reports" (specifically those sections that pertain to documenting inspection findings)

7. IMC 0612, Appendix B, "Issue Screening"
8. IMC 0620, "Inspection Documents and Records"
9. 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 the thresholds for determining what findings should be documented in an inspection report.
2. Describe the relationship between an issue of concern, performance deficiency, and cross-cutting aspect.
3. Describe standards which could be used to define a performance deficiency and why deviating from these standards may not be a violation of NRC requirements.
4. Describe how to process a finding **using the screening questions of a particular SDP appendix** and the possible outcomes. (For power reactor inspectors only)
5. **Describe how traditional enforcement (TE) violations are processed. Consider TE violations associated with (and without) a performance deficiency.** (For power reactor inspectors only)
6. Discuss how to write an inspection report input.
7. Discuss how to write a violation. Contrast the differences in documenting a non-cited violation and an apparent violation; and for power reactor inspectors, a violation that is not suitable for evaluation using the SDP.
8. Contrast the difference between documenting inspector-identified and licensee-identified violations (format, threshold, cross-cutting aspects, tracking, etc.). (For power reactor inspectors only)

TASKS:

1. Use IMC 0609 and IMC 0612, or IMC 0615, to determine whether an identified issue is above the threshold for documentation.
2. Use IMC 0612, Appendix B and IMC 0310 to identify the crosscutting aspect associated with a finding. (For power reactor inspectors only)

3. Use IMC 0609, Attachment 4 and IMC 0609, Appendix A to process a finding using the screening questions. (For power reactor inspectors only)
4. Use IMC 0612 or IMC 0615, and other available guidance, to draft an inspection report input.
5. Given a violation of regulatory requirements and the enforcement policy and guidance, write the analysis and enforcement sections for a finding, a violation, and a non-cited violation; and for power reactor inspectors, a finding with a safety culture cross-cutting aspect.
6. Use IMC 0330 and IMC 0620 to describe how to determine the documents that must be included as attachments to an inspection report for the agency record.

DOCUMENTATION: Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-5.

Basic-Level Signature Cards and Certification

<i>Inspector Name:</i> _____	<i>Employee Initials/Date</i>	<i>Supervisor's Signature/Date</i>
A. Training Courses		
H-100, Site Access Training (or licensee site access)		
R-100, Reactor Concepts (for power reactor inspectors only)		
P-105, PRA Basics for Regulatory Applications (for power reactor inspectors only)		
G-104, Expectations for Inspectors		
B. Individual Study Activities		
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission		
ISA-2 Navigating the NRC's Internal and External Web Sites		
ISA-3 Inspector Objectivity, Protocol, and Professional Conduct		
ISA-4 Fitness-for-Duty Rule		
ISA-5 Allegations		
ISA-6 NRC's Response to an Emergency at a Nuclear Facility		
ISA-7 The Enforcement Process		
ISA-8 The Office of Investigations		
ISA-9 Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page		
ISA-10 Performance Indicator Program		
ISA-11 Augmented Inspection Team, Special Inspection Team, and Incident Inspection Team Activities		
ISA-12 Understanding How the Commission Operates		
ISA-13 Organization and Content of the NRC Inspection Manual		
ISA-14 NRC Interagency Agreements		
ISA-15 Interactions with the Public		
ISA-16 Contacts with the Media		
ISA-17 Institute of Nuclear Power Operations, Nuclear Energy Institute, and National Organization of Test, Research and Training Reactors		
ISA-18 The Freedom of Information Act and the Privacy Act		
ISA-19 Entrance and Exit Meetings		

	<i>Employee Initials/Date</i>	<i>Supervisor's Signature/Date</i>
ISA-20 Documenting Inspection Findings		
ISA-21 Open, Collaborative Working Environment & Ways to Raise Differing Views		
ISA-22 Overview of 10 CFR Part 50 (for power reactor inspectors only)		
ISA-23 Overview of 10 CFR Part 19 and 10 CFR Part 20		
ISA-24 Licensee-Specific Regulatory Documents and Procedures		
ISA-25 Security Requirements for Nuclear Power Plants (for power reactor inspectors only)		
ISA-26 Exploring the Operating Reactor Assessment Program (for power reactor inspectors only)		
ISA-27 Generic Communications		
C. On-the-Job Training Activities		
OJT-1 Facility Familiarization Tour with a Qualified Inspector		
OJT-2 Control Room Tour with Resident or Other Qualified Inspector		
OJT-3 Licensee Plan-of-the-Day Meeting (for power reactor inspectors only)		
OJT-4 Inspection Activities		
OJT-5 Documenting Inspection Findings		

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

<div style="text-align: center;"> <h2>Basic Inspector Certification</h2> <div style="border-bottom: 1px solid black; width: 200px; margin: 0 auto;"></div> <p>(name)</p> <p>Has successfully completed all of the requirements to be certified as a</p> <h2 style="margin: 10px 0;">BASIC INSPECTOR</h2> <div style="display: flex; justify-content: center; gap: 50px;"> <div>Supervisor Signature _____</div> <div>Date _____</div> </div> </div>

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	
H-100, Site Access Training (or licensee site access)	
R-100, Reactor Concepts (for power reactor inspectors only)	
P-105, PRA Basics for Regulatory Applications (for power reactor inspectors only)	
G-104, Expectations for Inspectors	
B. Individual Study Activities	
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission	
ISA-2 Navigating the NRC's Internal and External Web Sites	
ISA-3 Inspector Objectivity, Protocol, and Professional Conduct	
ISA-4 Fitness-for-Duty Rule	
ISA-5 Allegations	
ISA-6 The NRC's Response to an Emergency at a Nuclear Facility	
ISA-7 The Enforcement Process	
ISA-8 The Office of Investigations	
ISA-9 Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page	
ISA-10 Performance Indicator Program	
ISA-11 Augmented Inspection Team, Special Inspection Team and Incident Inspection Team Activities	
ISA-12 Understanding How the Commission Operates	
ISA-13 Organization and Content of the NRC Inspection Manual	
ISA-14 NRC Interagency Agreements	
ISA-15 Interaction with the Public	
ISA-16 Contacts with the Media	

ISA-17 Institute of Nuclear Power Operations, Nuclear Energy Institute, and National Organization of Test, Research and Training Reactors	
ISA-18 The Freedom of Information Act and the Privacy Act	
ISA-19 Entrance and Exit Meetings	
ISA-20 Documenting Inspection Findings	
ISA-21 Open, Collaborative Working Environment & Ways to Raise Differing Views	
ISA-22 Overview of 10 CFR Part 50 (for power reactor inspectors only)	
ISA-23 Overview of 10 CFR Part 19 and 10 CFR Part 20	
ISA-24 Licensee-Specific Regulatory Documents and Procedures	
ISA-25 Security Requirements for Nuclear Power Plants (for power reactor inspectors only)	
ISA-26 Exploring the Operating Reactor Assessment Program (for power reactor inspectors only)	
ISA-27 Generic Communications	
C. On-the-Job Training Activities	
OJT-1 Facility Familiarization Tour with a Qualified Inspector	
OJT-2 Control Room Tour with Resident or Other Qualified Inspector	
OJT-3 Licensee Plan-of-the-Day Meeting (for power reactor inspectors only)	
OJT-4 Inspection Activities	
OJT-5 Documenting Inspection Findings	

Supervisor's Recommendation Signature/Date_____

Division Director's Approval Signature/Date_____

Copies to: Inspector
 HR Office

Revision History Sheet for IMC 1245, Appendix A
Attachment 1

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	10/31/06 CN 06-032	To increase training associated with documenting finding and violations in inspection reports (ISA-20 and OJT-5), to update references, and to incorporate minor editorial changes. Completed 4 year historical CN search	None	ML 062890456
N/A	01/10/08 CN 08-001	Add training on performance indicators and updated various references and training activities.	None	ML073510727
N/A	07/08/09 CN 09-017	Adds a minor training task to ISA-26 (scanning IMC 0320, "Operating Reactor Security Oversight Process"), updates various Web addresses, and expands the scope of training on the differing professional opinion process to include open, collaborative working environment and ways to raise differing views.	None	ML091590710
N/A	ML11175A312 12/29/11 CN 11-044	This revision adds industrial safety courses as required training, adds a task to familiarize staff with the NRC Knowledge Center to ISA-2, adds guidance on ethics from OGC's Website to ISA-3, adds evaluation criteria and updates references and terminology regarding allegations to ISA-5, adds training on documenting violations to ISA-7, adds guidance on performance indicators to ISA-10, adds a new independent study activity (ISA-27) on Generic Communication, and updates references and guidance.	None	ML11308A645

Revision History Sheet for IMC 1245, Appendix A
Attachment 1

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	ML12241A367 12/19/12 CN-12-029	This revision updates training on the significance determination process in OJT-5 to reflect recent changes to IMC 0609, "Significance Determination Process."	None	Closed FF: 1245A-1822