DUKE ENERGY.

Crystal River Nuclear Plant
15760 W. Power Line Street
Crystal River, FL 34428

Docket 50-302
Operating License No. DPR-72

10 CFR 50.2

February 6, 2014
3F0214-04

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Crystal River Unit 3 – Request for Approval of the Certified Fuel Handler Training and Retraining Program Response to a Request for Additional Information

Reference: CR-3 to NRC letter dated April 15, 2013, "Crystal River Unit 3 – Request for Approval of the Certified Fuel Handler Training and Retraining Program," (ADAMS Accession No. ML13130A125)

Dear Sir:

In accordance with 10 CFR 50.2, Duke Energy Florida, Inc. (DEF), hereby submits the response to a Nuclear Regulatory Commission (NRC) request for additional information (RAI) received via email from the NRC Project Manager for Crystal River Unit 3 (CR-3), dated January 27, 2014, regarding the April 15, 2013 submittal (Reference). The Attachment to this letter provides the RAI response.

There are no new regulatory commitments made within this submittal.

If you have any questions regarding this submittal, please contact Mr. Dan Westcott, Manager, Nuclear Regulatory Affairs, at (352) 563-4796.

Sincerely,

Terry Hobbs
General Manager, Decommissioning
Crystal River Nuclear Plant

TH/par

Attachments: 1   Response to Request for Additional Information - Request for Approval of the Certified Fuel Handler Training and Retraining Program
             2. TRN-1000, Revision 1, "DTO – Performance Based Training"

xc: NRR Project Manager
        Regional Administrator, Region I

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NRR

DUKE ENERGY FLORIDA, INC.

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ATTACHMENT 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION -
REQUEST FOR APPROVAL OF THE CERTIFIED FUEL
HANDLER TRAINING AND RETRAINING PROGRAM

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION – REQUEST FOR APPROVAL OF THE CERTIFIED FUEL HANDLER TRAINING AND RETRAINING PROGRAM

By letter dated April 15, 2013, (Reference 1), Duke Energy Florida, Inc. (DEF), requested approval for the Certified Fuel Handler Training and Retraining Program for Crystal River Unit 3 (CR-3). On January 27, 2014, via email from the NRC Project Manager for CR-3, the NRC requested a response to the following question:

REQUEST FOR ADDITIONAL INFORMATION

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated April 15, 2013, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13130A125, the submittal), Duke Energy Florida, Inc. (DEF, the licensee), submitted a request to approve the Certified Fuel Handler (CFH) Training and Retraining Program for the Crystal River Unit 3 Nuclear Generating Plant (CR-3). The NRC staff finds that additional information is needed to complete its review:

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 55.4, "Definitions," defines the Systems Approach to Training (SAT) process and contains five elements that must be included in the SAT training program. Section 2.1, "Fundamentals Training," of the submittal describes the first two elements of the SAT process as:

- Analysis of job performance requirements and training needs
- Derivations of learning objectives based upon the preceding analysis.

The CFH training and retraining program description included in the April 15, 2013, program approval request does not explicitly describe a job performance analysis or the training objectives that were developed as a result of the analysis.

Please describe the job performance analysis used, and the training objectives that were developed as a result.

Response:

The program has been developed by CR-3 Training and Operations personnel using the currently approved task list. A job analysis was performed using the task lists previously developed for a Senior Reactor Operator (SRO), Shift Manager (SM), and Shift Technical Advisor (STA). This job analysis was performed by Training and Operations personnel. Operations personnel performed the Difficulty, Importance, and Frequency (DIF) review for the job analysis assuming that the plant was in the condition expected at the time of termination of operator licenses.

No new tasks were identified and, using the job analysis and DIF ratings, tasks that are no longer applicable for the current plant conditions were deselected. Since there are no new tasks, the previous analyses performed for these tasks is sufficient, as are the objectives previously developed and used in lesson material.

The Certified Fuel handler Training and Requalification Program documents will be issued upon program approval by the NRC, which will establish the program. CR-3 procedure TRN-1000,

Revision 1, "DTO - Performance Based Training," contains requirements that ensure the Systematic Approach to Training is used for maintaining the training program, including an annual review of the program which is documented and reported to senior management. This document is enclosed as Attachment 2.

REFERENCES

1. CR-3 to NRC Letter dated April 15, 2013, "Crystal River Unit 3 – Request for Approval of the Certified Fuel Handler Training and Retraining Program," (ADAMS Accession No. ML13130A125)

DUKE ENERGY FLORIDA, INC.

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ATTACHMENT 2

TRN-1000, REVISION 1,

"DTO – PERFORMANCE BASED TRAINING"

CRYSTAL RIVER UNIT 3

ADMINISTRATIVE PROCEDURE

TRN-1000

DTO - *PERFORMANCE BASED TRAINING*

REVISION 1

TABLE OF CONTENTS

1.0 PURPOSE

1. This procedure describes the basic process in administering and maintaining transition training programs at Duke Energy, Crystal River 3 during decommissioning.

2. This procedure provides a systematic approach to training implemented at Crystal River 3 nuclear plant.

3. This procedure describes the training processes for the decommissioning site.

2.0 REFERENCES

2.1 Developmental

1. ANSI/ANS 3.1 - 1979 (DRAFT), Qualification and Training for Personnel for Nuclear Power Plants

2. ANSI 18.1, Selection and Training of Nuclear Power Plant Personnel, March 8, 1971.

3. 10CFR50.120, Training and Qualification of Nuclear Power Plant Personnel

4. NUREG-1220, Rev. 1, Training Review Criteria and Procedures

5. Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)

6. Regulatory Guide 8.27, Radiation Protection Training for Personnel at Light Water-Cooled Nuclear Power Reactors

7. NRC Inspection Procedure 36801, Organization, Management, and Cost Controls at Permanently Shutdown Reactors

8. NRC Inspection Procedure 60801, Spent Fuel Pool Safety at Permanently Shutdown Reactors

9. TPP0200, Licensed Operator Continuing Training Program

3.0 DEFINITIONS

1. **Curriculum Review Committee (CRC):** A committee which plans and reviews training in order to meet the needs of the section.

2. **DTO:** Decommissioning Transition Organization

3. **Graded Approach:** A process for determining job and task requirements based on existing and available resources such as technical manuals, subject matter experts (SME), procedures, etc. The graded approach also defines the extent to which the documentation of the systematic approach to training (SAT) process is needed and expected based upon the importance of the job or task to nuclear safety, reliability, and the complexity of the job performance requirements. (Attachment 4, Graded Approach to SAT Documentation Form)

4. **Independent Work:** Work performed independent of direct supervision by trained, qualified personnel.

5. **Individual Training Plan (ITP):** An acceptable method for documenting the systematic evaluation of an individuals previous training history, education and experience; determining whether specific knowledge and skills exemption criteria is met; and establishing a timeline for the completion of the courses and task qualifications needed to meet the needs of the section manager.

6. **Just in Time Training (JITT):** Training that is provided as close to the work evolution or task performance as possible. This training is provided to address a performance trend, a corrective action, industry Operating Experience or other triggering event.

7. **Qualification:** The process by which supervision certifies personnel under their direction to perform specific tasks and job functions independently.

   • Individuals who develop, teach, or attend vendor or industry training on new skills/knowledge/ abilities (i.e., new equipment initial training) may be designated as the Subject Matter Experts (SMEs) with management concurrence. SMEs are qualified to conduct task OJT or SVE.

8. **Qualification Training Guide (TG):** Position specific training designed to provide engineers with the ability to conduct work activities to applicable codes, standards, regulations, company policy and procedures.

9. **Remediation:** The act of providing the additional training that is intended to correct identified weaknesses. Interaction between trainer and student(s) that provides additional training to raise the level of performance to prescribed standards.

10. **Skills Verification (SV)** - Process used to ensure that personnel have retained sufficient mastery of task performance standards to authorize them to work independently. Skill Verification sessions may be conducted in a manner that allows for the immediate correction of performance not meeting plant standards.

11. **Skills Verification Evaluation (SVE):** The process of validating competency on practical factors and performance items which personnel must demonstrate in the work place or simulated work environment while being evaluated by a qualified task evaluator.

3.0 DEFINITIONS (continued)

12. **Station Performance Oversight Committee (SPOC):** A committee that has multiple oversight responsibilities, one of which is to provide guidance and oversight for implementation of training for the Decommissioning Transition Organization.

13. **Subject Matter Expert (SME):** A person who has attained a level of expertise by education, experience, or plant/vendor task qualification.

14. **Systematic Approach to Training:** A systematic process used to determine job performance requirements, specify training programs content and settings, prepare supporting training materials, and maintain the training programs per 10CFR55.4 that includes, but is not limited to, the following elements:

    a. Systematic analysis of the jobs to be performed.

    b. Learning objectives derived from the analysis that describes desired performance after training.

    c. Design and delivery of training based on the learning objectives.

    d. Evaluation process demonstrating that mastery of the learning objectives was achieved.

    e. Evaluation and revision of the training program based on the job performance of the training personnel working in the specified job setting.

15. **Task:** A defined unit of work having an identifiable beginning and end, containing two or more elements.

16. **Task List:** A list of tasks for a specific job or position. This list includes all tasks selected and deselected for initial and continuing training.

17. **Task Performance Evaluation (TPE):** The process used during initial training for the validation of competencies on practical factors and performance items which personnel must demonstrate in the work place or simulated work environment while being evaluated by a qualified task evaluator. Task performance evaluation is distinct and separate from on-the-job training.

18. **Task Performance Manual (TPM):** Repository for discipline specific knowledge and skills elements normally grouped under tasks. The TPM is a living document reflecting the changing dynamics of the Decommissioning Transition Organization (DTO). The TPM contains but is not limited to the following:

    *   Task List, including a listing of core tasks, when applicable

    *   Task to Training Matrix, including the difficulty, importance and frequency (DIF) ratings used for the establishing initial and continuing training recommendations for the applicable Curriculum Review Committees.

    *   Task specific knowledge, skill, and abilities (KSAs) for the successful independent job performance.

19. **Training Request:** A method used to communicate an identified or potential training need to the training organization. The training request is a mechanism used to identify training needs by the line organization.

4.0 RESPONSIBILITIES

1. **Director – Decommissioning Transition Organization** is responsible for:

   - Overall implementation of Training Programs and determining supervisory training requirements.

   - Determining the need for Curriculum Review Committees.

2. **Section Manager – Decommission Transition Organization** is responsible for:

   - Overall implementation of Training Programs and determining supervisory training requirements.

   - Determining the need for a Curriculum Review Committee and acting as, or designating, a chairperson for the Curriculum Review Committee.

   - Strategically selecting, scheduling and ensuring resources are provided to implement training for the applicable DTO's revised Job and Task Analysis DIF (Difficulty, Importance and Frequency) factors for each job description.

3. **DTO Supervisor** is responsible for:

   - Reviewing / Approving Task Lists.

   - Reviewing / Approving Training Requests.

   - Conducting annual review of the training program backbone schedule as well as emergent training needs.

   - Reviewing and approving exemptions and alternate qualifications.

   - Verifying qualifications prior to assigning work utilizing a DTO approved qualification database.

   - Selecting Subject Matter Experts to develop and provide job specific training for personnel within their organization.

   - Observing job incumbent activities to identify potential performance problems, evaluate the effectiveness of delivered training and determining if additional training is needed.

4. **DTO Performance Support Supervisor** is responsible for:

   - Managing and overseeing the SAT Process.

   - Monitoring Training Program implementation and evaluation.

   - Periodically reviewing student feedback and observations to assess effectiveness of the Decommissioning Transition Organizations training programs.

   - Periodically observing job incumbent activities to identify potential performance problems, evaluating the effectiveness of delivered training, and determining if additional training is needed.

4.0 RESPONSIBILITIES (continued)

5. **DTO Training Staff** is responsible for:

- Providing educational/instructional guidance in the development and maintenance of training program documents.

- Assisting the Decommissioning Transition Organization in providing training based on an application of the Systematic Approach to Training.

6. **DTO Personnel/Incumbents** are responsible for:

- Validating qualifications prior to conducting work, utilizing a DTO approved qualification database.

- Identifying training needs.

- Submitting Training Requests.

- Participating in training committees and/or providing comments on proposed training.

- Participating in scheduled training and applying the learning on the job.

7. **Instructors/Trainers** (when assigned) are responsible for:

- Conducting training.

- Administering written and oral examinations.

- Administering performance evaluations.

- SRO Certified Instructors are responsible for completing 20 hours of in-plant time and maintaining SRO Certification.

8. **Subject Matter Experts (SME's)** are responsible for:

- Conducting training, when selected.

- Administering written and oral examinations.

- Administering performance evaluations.

9. **Training Coordinator - DTO**

- Coordinating cross-discipline training activities.

- Maintaining the qualification database.

5.0 PREREQUISITES

None

6.0 PRECAUTIONS, LIMITATIONS, AND NOTES

None

7.0 SPECIAL TOOLS AND EQUIPMENT

None

8.0 ACCEPTANCE CRITERIA

None

9.0 INSTRUCTIONS

9.1 Program Oversight

1. Crystal River 3 Decommissioning Transition Organization has established 2 levels of training committees.

   - The Station Performance Oversight Committee (SPOC) provides senior management oversight of station programs including station training programs. The SPOC ensures training is being used to maintain satisfactory station performance during SAFSTOR/Decommissioning activities.

   - Curriculum Review Committees (CRC) provide incumbent and line management input into DTO training programs and reviews training programs ensuring they are being used to sustain satisfactory discipline specific performance. This committee is optional based on need determined by the section manager.

2. Agenda and supporting materials should be distributed to attendees prior to the meeting.

9.1.1 Review of Training Items by Station Performance Oversight Committee (SPOC)

1. The SPOC shall meet at a minimum of once a year and as needed to discuss the following training needs and issues (this meeting may be held via video conference or teleconference if deemed appropriate).

   a. Determine next years training budget needs.

   b. Reviewing changes in operating philosophy and regulatory requirements and their impact on training programs.

   c. Providing an active coordination interface between the Duke training organizations.

   d. Providing a forum for the exchange of information on topics such as:
      - Identification of problems and ideas
      - Trainee academic performance
      - Upcoming training program changes
      - Guidance on the implementation of training initiatives
      - NRC regulations
      - NEI guidelines
      - ANI guidelines
      - Utility issues

   e. Providing input to off-site or non-standard training provided to personnel.

   f. Setting management expectations for training

   g. Monitoring station performance to identify site-wide training needs

   h. Setting management expectations for training

      i.   Setting management expectations for training

      j.   Monitoring station performance to identify site-wide training needs

      k.   Evaluating training effectiveness

      l.   Assessing demographics to identify long-term training needs

      m.   Ensuring resources are available to implement training needs

2. Meeting minutes should document the discussion of key agenda elements, summarize important open discussion topics, capture SPOC determinations on program effectiveness, and document the initiation and disposition of SPOC action items.

9.1.2 Curriculum Review Committee (CRC)

1. The CRC provides strategic direction of the training program and leverages training to improve line performance. This includes the evaluation of training and line performance and feedback from supervisors and trainees to identify training needs.

2. The CRC is conducted a minimum of once a year. The Discipline Manager may determine if additional CRC's are required to address the training needs of the line organization.

3. The CRC is chaired by the Supervisor or Manager of the respective discipline.

4. CRC membership consists of the following personnel:

   - CRC Chairperson

   - DTO Performance Support Supervisor, or designee

   - Training Guest Instructors/DTO Instructor (as assigned)

   - Discipline Incumbents

5. CRC meeting quorum requires a minimum of the CRC Chairperson, a training representative (Training Representative or Performance Support Supervisor) and an incumbent.

6. The CRC should oversee the review of each training program's task list biennially at a minimum and document this review in the meeting minutes. (Based on DTO activities and changes with plant equipment status, the training program task lists may need to be reviewed, revised and approved on a more frequent basis.)

7. For continuing training, a Training Matrix may be used to document the training program content for the current biennial training period.

8. Meeting minutes should document the discussion of key agenda elements, summarize important open discussion topics, capture CRC determinations on program effectiveness, and document the initiation and disposition of CRC action items (i.e., tracked through Passport NTM action items).

9.2 Training Administration

9.2.1 Entry Level Knowledge and Experience

1. Applicants or new hires must meet the entry level knowledge and experience requirements for any job classification (operations and support) specified in the American National Standard ANSI 18.1-1971 or ANSI 3.1, when applicable (e.g., Radiation Protection Manager).

2. Individuals not meeting the ANSI entry level knowledge or experience must have their independent work assignments restricted until the portion of their Individual Training Plan, or equivalent document, addressing that shortfall is completed.

9.2.2 Initial Training Requirements

Initial job classification training requirements are specified in the Training Program Procedures (TPPs).

9.2.3 Verification of Qualifications (Line Organization)

1. ENSURE training and qualifications are satisfied prior to performing a task or an evolution by using one of the following, as applicable:

   - On-line databases

   - Training/Qualification report matrix hard copy (with the time and date of report generation) less than to or equal to seven days old.

   - Automatically generated qualification reports.

   - "In hand" qualification or exemption paperwork, which has been approved by Line Management, for the task and associated all day components or ancillary tasks needed to perform the task, may be used as a qualification record until such time the paperwork has been entered into an on-line qualification database.

2. PERFORM verification daily if a work assignment extends beyond a shift.

3. Supervisors shall only assign independent performance of tasks or functions to qualified individuals.

4. If a worker that is not qualified to perform independent work has been assigned work that requires qualification, he/she should not perform the work and shall notify their supervisor immediately.

5. For qualifications with an expiration date, ENSURE appropriate measures are taken to confirm worker qualification throughout the conduct of the assigned task.

6. Workers should KNOW and MAINTAIN their qualifications.

9.2.4 Exemption/Alternate Qualifications

> **NOTE:** Exemption and Alternate Qualifications shall be reviewed on a case-by-case basis.

1. REVIEW the following information to determine exemptions and alternate qualifications:

   - Review of previous training, education, and experience records

   - Knowledge based examination

   - Skill based examination (e.g., completion of TPE; SVE; TPM; TG)

2. DOCUMENT exemption or alternate qualification on Attachment 1, Training Exemption Approval (or equivalent) and FORWARD completed documentation to Records.

9.2.5 Remediation

1. REMEDIATE identified performance deficiencies using Attachment 5, Remediation Action Plan, by:

   a. ANALYZING why the standard was not met (e.g., knowledge, skill, behavior)

   b. DESCRIBE the performance gap (delta between desired v. demonstrated)

   c. DETERMINE if qualifications should be removed

   d. SPECIFY the actions to be taken to close the performance gap (self-study; supervised practice, addition instruction, assignment of a mentor, etc.)

   e. OBTAIN line management approval and performance improvement supervision concurrence for action plan items

2. TRACK the progress made in the completion of the action items (timelines met).

3. VALIDATE that the performance standard is now being met.

4. **IF** qualifications were removed, **THEN** RESTORE the qualifications.

5. PROCESS the completed Remediation Action Plan as a QA Record.

9.3 Analyze Training Needs

9.3.1 Training Requests (CRC)

> **NOTE:** Just-in-Time Training (JITT) should be requested using the following process.

1. IDENTIFY training needs or recommendations from the following sources:

   - Changes in management expectations
   - Human performance trending
   - Management feedback
   - New or revised procedures or processes
   - New or revised regulatory and industry documents
   - New tools or test equipment
   - Operating experience
   - Personnel performance deficiencies
   - Plant or equipment modifications
   - Incumbent feedback
   - Site Corrective Action Process

2. FORWARD a request for training to the Training Program Owner.

9.3.2 Determining Training Requirements (DTO Supervisors)

1. Requests for training should be forwarded to the discipline supervisors.

2. An annual training needs survey may be conducted to determine additional continuing training requirements.

9.3.3 Maintaining the Core Task List (DTO Supervisors)

1. MAINTAIN the Core Task List that, as a minimum, identifies the following:

   - Program Title
   - A list of all tasks or topics (including task number and titles)
   - Identification of training documents and evaluation instruments for those tasks selected for training.

2. CONDUCT a biennial review to ensure the Task List accurately reflects the following:

   - All tasks/topics performed by job incumbents.
   - Tasks/topics selected for training reflect current training documents and evaluation method.

9.3.3 Maintaining the Core Task List (DTO Supervisors) (continued)

3. REVISE the Task List as needed for changes, such as:

- Identification of new task(s) (i.e., new equipment, modifications, plant equipment abandonment)

- Modification of existing tasks

- Selection or de-selection of task(s) for training

4. DOCUMENT the Task List changes, including comments and rationale.

5. REVISE the training program description and associated training documents, as appropriate.

6. APPROVE the Task List.

9.4 Training Material Design Activities

9.4.1 Initiating Training Solutions (SME's & DTO Supervisors)

1. DETERMINE if training is based on a new or modified task. If training is based on a new or modified task, then perform the following actions:

   a. REVISE Task Performance Manual, as appropriate.

   b. REVISE the Task List, as appropriate.

2. DETERMINE if current training documents exist, including documents at other Duke Energy fleet sites and training programs.

   a. If current training documents exist and are in need of revision, then REVISE training documents before implementation of training.

   b. If current training documents do NOT exist, DEVELOP training materials for Training Program Owner approval.

   c. IF current training documents exist that meet the requested action and are acceptable to the Program Owner, then SCHEDULE training.

9.4.2 Initiating Alternative Solutions to Training Actions

1. If training is not selected, then INITIATE any of the following methods, as appropriate:

- Procedure change request

- Information sharing

- Job aid

- Human performance review

- Other applicable station processes to address the issue

2. NOTIFY initiator of any actions to be taken and status of training request.

9.4.3 Developing/Revising Written/Oral Examination (SME's and/or DTO Training Staff)

1. DEVELOP, REVISE, OR DELETE written test questions which support specific learning objectives. Test questions shall support the learning objective being evaluated.

2. DEVELOP, REVISE, OR DELETE oral test questions which support specific learning objectives. Oral questions administered for qualification purposes shall be written down with the answer to ensure reliable and valid oral boards are conducted.

3. DEVELOP written or oral examinations in any one of the following formats or combinations, as appropriate:

   - Multiple choice

   - True/False

   - Matching

   - Short answer

4. IF developing a remedial exam, ENSURE the following:

   - Remedial exam differs from the previous exam sufficiently to determine student mastery of the exam topics.

   - Areas failed on the previous exam are included.

   - Areas which the trainee previously passed may be included.

5. APPROVE written or oral examination.

9.5 Training Material Development Activities

9.5.1 Determining Training Methods (SME's and/or DTO Training Staff)

1. CONSIDER the following training methods when developing Lesson Plans/Training Materials:

   - Lecture

   - Demonstration/practice

   - Guided discussion

   - Self-paced

   - Walk through

   - Role-playing

   - Dynamic learning activities

2. DETERMINE which training method(s) would be most suitable for the training being conducted. More than one training method may be incorporated into any one training session.

9.5.2 Develop Lesson Materials (SME's or DTO Training Staff)

1. Develop lesson plans containing the following:

    - Learning Objectives
    - Prerequisites
    - References
    - Commitments
    - Evaluation Method
    - Operating Experience
    - Tasks Associated with Lesson Plan
    - Lesson Plan Content
    - Summary

2. DEVELOP lesson plans in any of the following formats:

    - Single column
    - Two column
    - Self-Study Guide
    - Power Point Lesson

3. ORGANIZE lesson plan content using the following techniques:

    - Job Performance Order: The learning sequence is the same as the job sequence
    - Simple to Complex: Content may be sequenced in terms of increasing complexity
    - Critical Sequence: Content is ordered in terms of relative importance
    - Known to Unknown: Familiar topics are considered before unfamiliar topic

4. DEVELOP handouts, exercises, PowerPoint presentations, and other activities to support the training session.

5. REVISE training material as appropriate. Pen and ink changes are acceptable.

6. INITIAL and DATE pen and ink changes incorporated into the lesson plan prior to conducting training.

7. APPROVE lesson plan. (DTO Supervisor)

9.5.3 Maintaining Task Performance Manual (SME's and/or DTO Training Staff)

1. DEVELOP and MAINTAIN Task Performance Manuals for each training program. As a minimum, the following items should be included in the Task Performance Manual, unless contained in other training procedures (TRN), training correspondence documents (TRX) or training program procedures (TPP):

   - PURPOSE
   - SCOPE
   - DEFINITIONS
   - RESPONSIBILITIES
   - ENTRY LEVEL/EXPERIENCE REQUIREMENTS (TRN or program TPP)
   - INITIAL TRAINING REQUIREMENTS (program TPP)
   - CONTINUING TRAINING REQUIREMENTS (program TPP)
   - STANDARDS
   - REMEDIATION REQUIREMENTS (TRN)
   - REVIEW OF COMPLETED MANUALS
   - TASK TO TRAINING MATRIX (includes DIFs/retaining recommendations)
   - REFERENCED PROCEDURES (specific task signoff sheets)
   - GENERAL REFERENCES (specific task signoff sheets)
   - CORE TASKS MATRIX (if applicable)
   - PLANT SYSTEMS, COMPONENTS, and SPECIALIZED SKILLS MATRIX
   - TASKS
   - REVISION SUMMARY, JUSTIFICATION AND IMPLEMENTATION TIMELINES (Implementation Plan TRX Memo)

2. CONDUCT annual review of the Task Performance Manual and DOCUMENT results.

3. ENSURE all information is correct.

4. REVISE Task Performance Manual as necessary.

9.6 Conduct of Training

9.6.1 Allocating Instructional Resources (DTO Supervisor)

1. ALLOCATE instructional resources for the purpose of instruction.

   a. SELECT instructor/trainer or subject matter expert to conduct training based on the following:

      - Has expertise on the specific tasks or duty areas for which trainees will be trained and evaluated (task qualified)

      - Has overall job knowledge

      - Maintains high standards of performance and commitment to quality

      - Displays expected professionalism and judgment

      - Supports a conservative approach to nuclear safety

      - Practices expected observation and communication skills

9.6.2 Scheduling Training (CRC/DTO Supervisor)

1. CONTACT Training Coordinator to schedule training.

2. SCHEDULE and COORDINATE resources to support training request to include, but NOT limited to, the following:

   - Classroom/laboratory space

   - Training equipment, as appropriate

   - SME support, as appropriate

   - Trainees

3. SCHEDULE off-site training support personnel (e.g., instructors for First Aid Training) far enough in advance to ensure NO delays occur in implementing the training session.

9.6.3 Documentation of Training

1. DOCUMENT completion of training using a training attendance form for the following settings:

   - Classroom or Laboratory

   - Self-Study

2. DOCUMENT training or performance evaluation for OJT, TPE Mentoring, Job Familiarization Guide, Job Performance Measure or other skill based session on the appropriate qualification document.

3. FORWARD all completed documentation of training or evaluations to Records for filing. Examples of training documentation include, but NOT limited to, the following items:

   - Signed and implemented Lesson Plans

   - Record of Attendance forms

   - Completed OJT and TPE guides, Mentoring guides, Job Familiarization Guides and Job Performance Measures

   - Written or Oral Examination results

9.6.4 Conducting Examinations

1. MAINTAIN examination security by :

   a. MAINTAIN possession of the examination material at all times.

   b. When not in use, ensure the written/oral examinations are secured (e.g., an envelope marked CONFIDENTIAL, placed into a secured, locked exam bag, locked in a desk drawer or in a locked office) until all applicable personnel have completed the evaluation.

   c. When the examination material is transferred from one individual to another, delivery by hand is the preferred method.

   d. If examination material is sent through the mail, ensure the following requirements are met:

      - The examination material is in a sealed envelope identified as examination material (with the sender's signature covered by transparent tape across the seal).

      - The sealed envelope is placed in an unmarked mailing envelope marked PERSONAL and CONFIDENTIAL.

   e. PROTECT examinations in electronic form using password protected files or access restricted folders.

   f. MAINTAIN security requirements during examination process (e.g., establishing examination boundaries and controlling access to the exam area).

9.6.4 Conducting Examinations (continued)

2.   ADMINISTER examinations in accordance with the following:

    a.   PROVIDE the same exam directions to all trainees (e.g., how to select a response, time limits, acceptable reference materials, etc.).

    b.   ADMINISTER the exam to all trainees under the same conditions (e.g., one exam per trainee, standard time limits, same references, etc.).

    c.   PROCTOR the examination to the extent necessary to ensure the exam is not compromised.

    d.   When answering trainee's questions regarding test items, PROVIDE only information that clarifies the test item.

    e.   PROVIDE clarifying information to all trainees.

    f.   If administering an oral exam, SCRIPT questions and answers and DOCUMENT trainee's response to each question.

    g.   COLLECT all copies of exams (including supporting material and scratch paper) that were distributed.

    h.   GRADE all exams using the examination key.

    i.   ENSURE all trainees are given the opportunity to review their examinations to ensure the correct answers to any questions answered incorrectly are understood.

    j.   DOCUMENT the trainees grade/total points on the exam cover sheet.

    k.   If the trainee fails to achieve a passing score, TAKE the following action:

        1)   DETERMINE impact on qualifications.

        2)   IMPLEMENT remedial training.

        3)   ADMINISTER remedial exam. The remedial exam shall be 30% different than the initial exam. If the trainee fails the remedial examination, CONFER with the appropriate Training Program Owner to determine actions to be taken.

        4)   REINSTATE qualifications, if appropriate.

    l.   For performance based evaluation failures, TAKE the following actions:

        1)   DETERMINE impact on qualifications.

        2)   IMPLEMENT remedial training.

        3)   CONDUCT reevaluation.

        4)   REINSTATE qualifications, if appropriate.

9.6.5 End-of-Course Training Feedback

1. PROVIDE each trainee a Trainee Feedback Form at the completion of each training session.

2. DOCUMENT trainee feedback on the Trainee Feedback Summary Form, if desired.

3. FORWARD Trainee Feedback and/or Summary to the appropriate Training Program Owner.

4. REVIEW trainee feedback and DOCUMENT and TRACK actions taken.

9.7 Training Effectiveness

9.7.1 Post-Training Feedback

1. COLLECT post-training feedback on selected designated Initial and Continuing Training within six months after completion of training, or other appropriate timeframe.

2. SUMMARIZE post-trainee feedback using Post-Training Summary Form.

3. EVALUATE feedback and DOCUMENT necessary actions. TRACK actions taken.

9.7.2 Monitoring Training Programs (Line Organization)

1. CONDUCT an annual review of training programs. DOCUMENT and REPORT results to Senior Management. The review should include, but is not limited to, the following:

    - Progression of job incumbents enrolled in training courses

    - Task Performance Manual

    - Core Task List

    - Lesson Plans

    - Training Materials

    - Written and Oral Examinations

    - Training Feedback

    - Actions taken to resolve training issues, including revisions made to training materials based on job performance of trained personnel

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NOTE: Self-assessments must be critical and insightful, illustrative of a questioning attitude and add value to station performance

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2. CONDUCT and DOCUMENT training self-assessments. Training self-assessments can be either structured (CAP0200, Conduct of Performance Improvement) or ongoing (evaluation of training activities or observations of job performance) or a combination of both.

    a. REVISE training programs, materials or processes whenever the self-assessment identifies gaps in the performance of trained personnel working in their job setting.

10.0 RECORDS

1.   The following documents are records when completed. Submit to Site or Corporate Document Management and Information Services personnel for processing and storage in accordance with RDC-0001, CR3 Records Management Program:

- Attachment 1, Training Exemption Approval
- Attachment 5, Remediation Action Plan

Training Exemption Approval

Candidate Name:	Last 4 digits of Social Security No.:
Training or Evaluation to Be Exempted (Enter only one lesson/course title and code or task number and title per row)	**Basis for Exemption** (Attach supporting documentation)

We, the undersigned certify that the individual named above possesses the required knowledge and skills to perform the required task without having to complete training or evaluation.

Requested by: _____   _____
                                Incumbent Signature   Date

Approved by: _____   _____
                               Manager Signature   Date

Concurrence by: _____   _____
                            Performance Support Supervisor   Date

Distribution:
Original –
Performance Support Admin (input into the training tracking system and submitting to Document Services)

For Training Use Only		
Data entry in training tracking system complete:	_____ /	
	Signature	Date

QA Record, when complete

Job Analysis Data Collection Form

AR Tracking # _____   Program: _____   Topic: _____

Job Title: _____

Job Analysis Performed by:

Name: (Print)	Title	Signature / Date

Job Analysis Results:

☐ TASKS or ☐ Job Performance Requirements/ Knowledge Requirements	DIF Ratings[1]			Initial Training?		Continuing Training?		Suggested Retain Frequency[2]	Deselection Criteria[3] (Tasks only)
	D	I	F	Y	N	Y	N		

Upon Completion of Job Analysis Data Collection Form, copy the completed form to the World Folder of the ANY assignment.

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[1] DIF Ratings - See Attachment 2, Pages 2 and 3 for guidance on DIF ratings and selection for training criteria
[2] Retrain frequency is set/determined by the CRC
[3] Task training Deselection Criteria - See Attachment 2, Page 4

**Job Analysis Data Collection Form
DIF Rating and Selecting For Training**

DIFFICULTY OF PERFORMING THE TASK
(What is the level of effort, skill, or knowledge required to perform the task relative to other tasks constituting the job?)

1. **Very Easy** (Task is among the easiest of all tasks constituting the job.)

2. **Somewhat Easy** (Task is easier than average, but not among the easiest)

3. **Moderately Difficult** (Task is about average in difficulty)

4. **Very Difficult** (Task is harder than average, but not among the most difficult.)

5. **Extremely Difficult** (Task is among the hardest [most complex] constituting the job.)

IMPORTANCE OF PERFORMING TASK
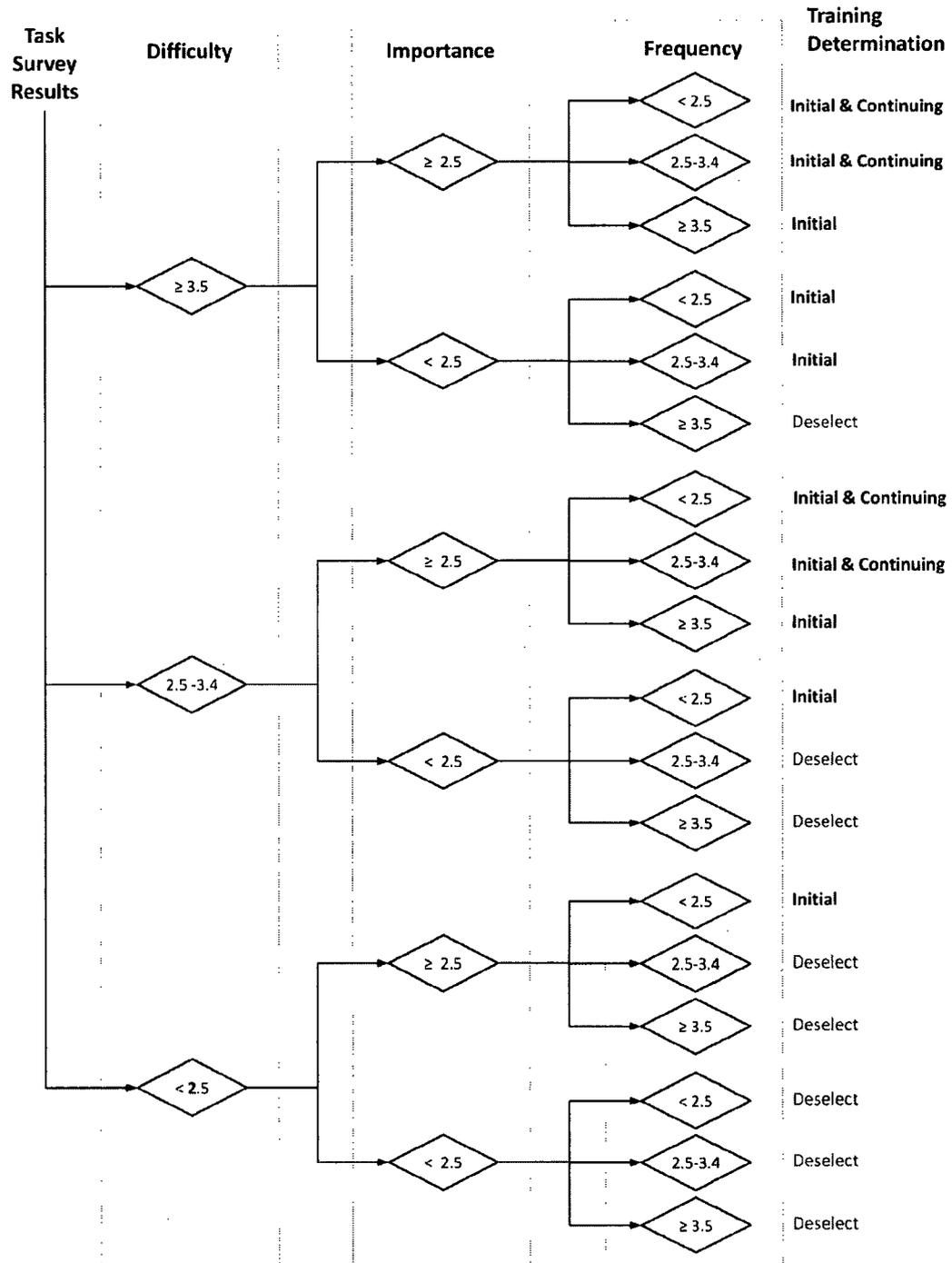(What is the overall consequence if the task is performed improperly?)

1. **Extremely Low** (Improper performance makes almost no difference in spent fuel safety or spent fuel cooling capabilities.)

2. **Low** (Improper performance leads to some undesirable, but not serious consequences.)

3. **Average** (Improper performance leads to significant consequences that require considerable corrective actions – may impair reliability of a system or process important to safety.)

4. **High** (Improper performance leads to severe consequences requiring extensive corrective action – definitely impairs reliability of a system of process important to safety.)

5. **Extremely High** (Improper performance leads to extremely severe consequences, such as costly recovery efforts, personnel injury or death, emergency event.)

FREQUENCY OF PERFORMING TASK
(How often does an individual perform the task?)

1. **Rarely** (about twice a year or less often)

2. **Seldom** (approximately once per calendar quarter)

3. **Occasionally** (about monthly)

4. **Often** (about weekly)

5. **Frequently** (more than once per week)

Job Analysis Data Collection Form
DIF Rating and Selecting For Training

Task Survey Results	Difficulty	Importance	Frequency	Training Determination
	≥ 3.5	≥ 2.5	< 2.5	Initial & Continuing
			2.5-3.4	Initial & Continuing
			≥ 3.5	Initial
		< 2.5	< 2.5	Initial
			2.5-3.4	Initial
			≥ 3.5	Deselect
	2.5 -3.4	≥ 2.5	< 2.5	Initial & Continuing
			2.5-3.4	Initial & Continuing
			≥ 3.5	Initial
		< 2.5	< 2.5	Initial
			2.5-3.4	Deselect
			≥ 3.5	Deselect
	< 2.5	≥ 2.5	< 2.5	Initial
			2.5-3.4	Deselect
			≥ 3.5	Deselect
		< 2.5	< 2.5	Deselect
			2.5-3.4	Deselect
			≥ 3.5	Deselect

Job Analysis Data Collection Form
Task Deselection Criteria

	CRITERIA	TRAINING MATERIAL DETERMINATIONS
1.	Task not currently performed at the plant by anyone.	Update Task List in the applicable TPM.
2.	Task is not performed by classification considered but is performed by another plant classification.	Provide notice to individual responsible for other classification's task list/TPM.
3.	Task learning can be satisfactorily accomplished on the job without formal training.	Update Task List in the applicable TPM.
4.	Skills and knowledge needed to perform the task are similar/identical to those required for another task in the same classification.	Ensure all skills and knowledge necessary to perform the selected task are in the training materials. Update Task List in the applicable TPM.
5.	Training on the task is provided by another classification's training program. The other training program is responsible for the task analysis. Incumbents learn by attending the other classification's training session.	Task remains on both task lists. It may be deselected on one. Update Task List in the applicable TPM, if necessary. Do not want to duplicate training efforts.
6.	The task requires formal training but is performed so infrequently or by so few incumbents that providing training is impractical.	Source of training is identified/determined by the affected section manager CRC.
7.	Task statement is incorrect.	An incorrect task statement will be treated either as a new task, a task title change, or a de-selection. Update Task List in the applicable TPM, if necessary.

Task Analysis Data Collection Form

AR Tracking # _____   Program: _____

Reviewed by SMEs: (Print)	Titles	Signature / Date

Job: _____   **References:** _____

_____

Task Statement: _____

Conditions: _____

Standards: _____

Element or Step	Knowledge	Skills / Abilities	Specific Condition or Standard	Training Source

Upon Completion of Task Analysis Data Collection Form, copy the completed form in the World Folder of the ANY assignment.

Task Analysis Data Collection Form

Instructions for Completing the Task Analysis Data Collection Form

General

The user may reformat the form, as needed, provided that each area is represented and provides for conformance to the instructions for completing the form. The user may also supplement the form with user-designed attachments to accommodate amplifying information. For example: The Job Analysis indicates that the Job requires 3 tasks. All three tasks may have some common elements; the KSAs for these elements do not have to be duplicated on each Task Analysis Form.

- Information should be provided for each area on the form or marked N/A.
- Industry and plant operating experience relevant to the task should be reviewed to facilitate the identification of skills/knowledge required to recognize precursors to inadequate performance; to prevent inadequate task performance; and to understand the consequences of inadequate performance.

  IF the consequences of inadequate performance are significant, **THEN** add specific elements/steps regarding the necessary contingency actions

Instructions for Each Area on the form

Area	Instructions
Action Request #	Record tracking method used to ensure the Task Analysis is reviewed and approved by the applicable CRC.
Program	Reference to the training program or worker classification that will be performing this task. Based on the nature of the DTO, some tasks may be performed by multiple disciplines.
Reviewers	Subject Matter Experts capable of validating analysis content and verifying that the right KSAs were identified for successful task completion.
Job	The job references to the top level of qualification. If the job analysis identified 3 tasks; then independent job performance requires an individual that can perform all 3 tasks. This does not preclude an individual that is task qualified from performing that individual task.
References	Refers to the documents used to analyze the task KSAs, i.e., regulations, vendor manuals, procedures, research papers, etc.
Task Statement	The task statement provides an overview of the end product or a unit of work, .e.g., Repack Manually Operated Values; Perform Radiological Surveys; Operate Fuel Handling Crane.
Conditions	Describes the general conditions required for the performance of the task; system isolated, prime mover decoupled from pump, area decontaminated, confined space permit established, instrument within calibration frequency, PMs complete, etc.
Standards	Normally approved procedures or vendor manuals used to ensure work is performed in a manner validated to result in a successful outcome.

Task Analysis Data Collection Form

Instructions for Each Area on the form (continued)

Area	Instructions
Element or Step	Logical breakdown of task performance (usually following work planning and scheduling activities are completed); Describe behavior expected from task performer. Example 1: "Record the temperature' Example 2: "Open the valve" List the element/steps in order of performance.
Knowledge	Describe discrete knowledge that support specific task performance requirements. Examples include: • Precautions to take • Methods for problem-solving, diagnosing, and troubleshooting • Potential problems associated with performance of task/element • Function and operation of systems • Function and operation of components • System-to-system relationships • Component-to-component relationships • System-to-component relationships The knowledge described in this area will be used to develop learning objectives for applicable self-study, classroom, or qualification checkout cards (QCC) Knowledge Checklist Items.
Skills/Abilities	Describe discrete skills that support specific task performance requirements. Examples include: • Ability to recognize cues, signals, and indications that call for action or reaction • Use/manipulation of controls, objects, tools, or equipment • Discrete actions /and or manipulations to be made • Ability to recognize cues, signals, and indications (i.e., feedback) that the action taken was, or was not correct/adequate The skills described in this area will be used to develop performance objectives for applicable laboratory, simulator or OJT sessions for QCCs.
Specific Condition or Standard	Describe the prerequisites for performing the element/step, i.e., circumstances which must exist before the element/step can be performed. If the work is being performed per an approved procedure, then performing the procedure steps in the order indicated ensures that the specific conditions for step performance is met.
Training Source	Describes how the training will be delivered; OJT, Lesson Plan, Vendor

Graded Approach to SAT Documentation Form

AR Tracking # _____   Program: _____   Topic: _____

Driver/Input for Analysis: _____

Analysis Decisions
Training Programs Affected *(Check applicable blocks – consult w/program leads)*

Technical Training Programs	Operations Training Programs	Other Programs (Identify)
☐ MM Type of Training ☐ RC ☐ Initial Training* ☐ EC ☐ Continuing Training ☐ ESP ☐ Work Group Specific ☐ EL CT (ESP) ☐ I&C ☐ Just In Time Training 　　　☐ Other:	☐ NLO/AO Type of Training ☐ RO/SRO ☐ Initial Training* ☐ CFH ☐ Continuing Training ☐ NCPO ☐ Just In Time Training 　　　☐ Other:	_____ Type of Training ☐ Initial Training* ☐ Continuing Training ☐ Just In Time Training ☐ Other:

*If Initial Training is selected, document lesson plan number affected: _____

Training solution identified?　☐ Yes
　　　　　　　　　　　　　　　☐ No

Basis for decision to deliver training: (What took place to make decisions to train?)
　　☐ Management Discretion
　　☐ Fundamental refresher (retrain tasks, etc.)
　　☐ Performance Improvement (ensure Performance Analysis is cross referenced if not contained within current TRF)
　　☐ Operating Experience
　　☐ Changes in Job Performance requirements
　　☐ Other, e.g., new tasks, new knowledge, benchmarking, information only (specify)

Description of training/non-training solution(s)

(If the training solution improves a knowledge/skill validate that no gap exists in the initial training program.)

Training Setting: What is the best location/setting for this instruction?

　　☐ Classroom　☐ Laboratory　☐ Simulator　☐ OJT　☐ JITT　☐ Other: _____

Graded Approach to SAT Documentation Form

AR Tracking # _____   Program: _____   Topic: _____

When utilizing the graded approach, complete the following sections.

Design Decisions
Evaluation of trainees: How do you plan to assess learning outcomes or competencies to determine whether students have met the objectives of the course?   ☐ Written Exam   ☐ TPE/JPM   ☐ SVE   ☐ Simulator   ☐ Laboratory   ☐ Other: _____   Learning Objectives: List learning objectives to be covered.

Development Decisions
Lesson Plan Number _____   ☐ New ☐ Revised ☐ Vendor   Review and Approval of materials is required per TRN-1000, DTO Performance Based Training. Approved materials will be vaulted for future reference.

Implementation Decisions
☐ Classroom ☐ Laboratory ☐ Simulator ☐ OJT   CT assignment may be used for tracking purposes

Evaluation Decisions
Initiate PTE assignment if a Post-Training Evaluation is to be completed

Remediation Action Plan

Remedial Action Plan	
Individual:	Qual/Course:
Last four digits SSN:	Program:

SECTION 1: Performance Review
Describe performance problem (Route to Employee's Supervisor) Instructor/Evaluator: _____ Date _____ Tracking # _____ (If the remediation plan will extend one week beyond the date of performance issue, create a tracking assignment.)

SECTION 2: Qualification Removal
Is qualification to be removed? Yes / No   If yes, complete the rest of section 2. If no, N/A this section and continue to section 3. Qualification to be removed: _____ Employee Signature _____ Date _____Employee's Supervisor _____ Date _____ Training System Update   (PeopleSoft/PQD-Post failure for qualification) Update Completed by: _____ Date _____

SECTION 3: Action Plan		
Item	**Due Date**	**Completed Date**

Recommended: SME/ Instructor: _____ Date _____

Approved: Manager/Supervisor: _____ Date _____

Concurrence: Performance Improvement Supervisor _____ Date _____

SECTION 4 Completion of Action Plan Training
The above listed action plan training has been completed as of _____(date). All action items are complete. Employee's Supervisor _____ Date _____Qualifications should be reinstated accordingly.

Section 5 Restoration of Qualifications
PQD should be updated (PQD-post pass for qualification) for reinstated qualifications if so designated above. Performance Support Admin Signature _____ Date _____

Original- **Performance Support Admin for entering qualification updates and submitting to Document Services.** Copy- **Individual   Copy-Individual's supervisor**

QA Record, when complete

REVISION SUMMARY
PRR 00621542 (Master); 00626890

Step/Section	Description of Changes
Throughout	Added Skills Verification (SV) and Skills Verification Evaluation (SVE) Change Performance Improvement to Performance Support to align with DTO organization chart
3.0	Added the following definitions: • Individual Training Plan (ITP) • Qualification Training Guide (TG) • Skills Verification (SV) • Skills Verification Evaluation (SVE) • Task Performance Evaluation (TPE) • Task Performance Manual (TPM)
4.0.1	Removed the following responsibilities from Director - DTO • Acting as, ...a chairperson for the Curriculum Advisory Board • Acting as, ... a chairperson for the Training Advisory Board
4.0.9	Added Training Coordinator - DTO to TRN-1000 to provide consistency among other CR3 training procedures and training materials.
9.1.1	Changed title to describe SPOC expectations. (PRR 00626890)
Section 9.1.1, Steps 1, 3, 4, 5, 6	Deleted information concerning SPOC committee membership, quorum requirements, and agenda. These will be covered by Outlook Calendar Event Scheduling. (PRR 00626890)
9.2.1	Added new step for entry level knowledge and experience
9.2.2	Added new step that specifies that initial training requirements are documented in the specific training program procedures (TPPs)
9.2.5	Added new step for initiating and completing remediation action plans when knowledge, skill or behavior standards are not met.
9.5.3	Clarified that certain TPM information may reside in other training procedures or documents.
9.7.2.2	Added step to conduct and document training self-assessments.
10.0	Changed RDC-NGGC-0001 to RDC-0001 and added new Attachment 5
Attachment 2	Added guidance on performing task DIF ratings and altered the criteria regarding DIF importance to reflect the end of power operations Revised the Task Deselection Criteria - Task Training Determinations
Attachment 3	Simplified Task Analysis Data Collection Form and Instructions
Attachment 4 Page 1 of 2	Operations Training Programs: SM - Shift Manager and STA - Shift Technical Advisor removed; CFH - Certified Fuel Handler and NCPO - Non-Certified Plant Operator added Changes made based on Decommissioning status and current level of NRC submittals
Attachment 5	New form to support documentation and completion of Remediation Action Plans.