

# NUCLEAR POWER REACTOR SECURITY PERSONNEL TRAINING AND QUALIFICATION PLAN REVIEWER WORKBOOK

Interim Report



Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission

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**NUCLEAR POWER REACTOR  
SECURITY PERSONNEL TRAINING  
AND QUALIFICATION PLAN  
REVIEWER WORKBOOK**

Interim Report

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NUCLEAR POWER REACTOR SECURITY PERSONNEL  
TRAINING AND QUALIFICATION PLAN  
REVIEWER WORKBOOK

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## CHAPTER 1 - OVERVIEW

The Training and Qualification Plan Reviewer Workbook has been developed to provide the information required for evaluating the adequacy of the Training and Qualification (T&Q) Plans developed to meet the requirements of 10 CFR 73.55(b)(4) and 10 CFR 73, Appendix B (Published in final form in August 1978).

This workbook contains the following information:

- (1) Chapter 2 contains the criteria, indexed to Appendix B, used to assess the adequacy of the T&Q Plans and, where necessary, the procedure to be followed when applying the criteria to the plans.
- (2) Appendix A contains a set of standard licensee questions or requests, referenced to the criteria, that could be used by the reviewer to inform the licensee of possible deficiencies or omissions.
- (3) Appendix B contains a sample set of evaluation findings which specify how the T&Q Plans satisfactorily meet the requirements of 10 CFR 73.55(b)(4) and 10 CFR 73, Appendix B.
- (4) Appendix C contains acceptance criteria discussions as appropriate.
- (5) Appendix D contains copies of question and answers which have been sent to the licensees concerning implementation of 10 CFR 73, Appendix B.

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CHAPTER 2 - ACCEPTANCE CRITERIA

2.1 73.55(b)(4) IMPLEMENTATION SCHEDULE

ACCEPTANCE CRITERION (b)(4) - 1:

The licensee must provide an implementation schedule that shows how all security personnel will be qualified within 2 years of Training and Qualification Plan approval. The schedule must indicate the number of days following plan approval at which qualification of personnel will begin and the number of days following plan approval at which all personnel will be qualified.

2.2 SUITABILITY (App. B, I.A)

ACCEPTANCE CRITERION I.A-1:

The licensee must commit that, prior to employment or assignment to the security organization, and individual shall meet the following suitability criteria:

- a. Educational Development - possess a high school diploma or pass an equivalent performance examination designed to measure basic job related mathematical, language and reasoning skills, ability, and knowledge, required to perform security job duties. Personnel who have performed security job duties (documented) prior to the date of plan approval need not meet the education development requirement for those duties.
- b. Felony Convictions - have no felony convictions involving the use of a weapon and no felony convictions that reflect on the individual's reliability.

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ACCEPTANCE CRITERION I.A-2:\*

The licensee must commit that prior to employment or assignment to the security organization in an armed capacity, an individual must be the age specified in 10 CFR 73, Appendix B.

ACCEPTANCE CRITERION I.A-3:\*\*

The licensee must describe the elements used:

- (a) to determine that an individual has had no felony conviction involving the use of a weapon or that reflects on his or her reliability.
- (b) to determine that an individual assigned to an armed position is the age specified in 10 CFR 73, Appendix B.

REVIEW PROCEDURE: The descriptions submitted by all the sites will be surveyed. Based on the results of this survey a site may be requested to supply alternative methods. Consideration will be given to local legal restrictions.

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\* See Appendix for other Federal Restrictions Concerning Receipt, Possession or Transportation of Firearms.

\*\* This criteria is subject to change based on Commission action on Part 11.



- 2.3 PHYSICAL AND MENTAL QUALIFICATION (App. B, I.B)
- 2.3.1 PHYSICAL QUALIFICATIONS (App. B, I.B.1)
- 2.3.1.1 GENERAL PHYSICAL QUALIFICATIONS (App. B, I.B.1.a)

ACCEPTANCE CRITERION I.B.1.a.-1:

The licensee shall prescribe how he will assure that security personnel have no physical weakness or abnormalities which would adversely affect performance of assigned security duties. A commitment to observe personnel for physical weaknesses as part of the continued observation program (App. B, I.B.2.c) will meet this requirement.

- 2.3.1.2 PHYSICAL EXAMINATION (App. B, I.B.1.b)

ACCEPTANCE CRITERION I.B.1.b-1:

The licensee must commit that all armed security personnel and central alarm station operators shall successfully pass a physical examination administered by a licensed physician. The licensee must also prescribe that following the examination the physician must attest that the examination detected no condition that renders the individual incapable of performing their assigned crucial security tasks. The physical examination can be administered by licensed health professional trained to administer physical examinations provided the final attestation is made by a licensed physician.

ACCEPTANCE CRITERION I.B.1.b-2:

The licensee must prescribe that all armed security personnel shall meet the following visual requirements:

- (a) For each individual, distance visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses. If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall carry an extra pair of corrective lenses. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye. Field of vision must be at least 70° horizontal meridian in each eye. The ability to distinguish red, green and yellow colors is required. Loss of vision in one eye is disqualifying. Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means, provided such medications as may be used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security duties, and provided the visual acuity and field of vision requirements stated above are met.
- (b) Where corrective eyeglasses are required, they shall be of the safety glass type. Plastic lenses will be considered acceptable.

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ACCEPTANCE CRITERION I.B.1.b-3:

The licensee must prescribe that all armed security personnel shall meet the following hearing requirements:

- (a) Individuals shall have no hearing loss in the better ear greater than 30 decibels average at 500 Hz, 1000 Hz, and 2000 Hz, with no level greater than 40 decibels at any one frequency (by ISO 1964 or ANSI 1969 audiometry).
- (b) A hearing aid is acceptable provided suitable testing procedures demonstrate auditory acuity equivalent to the above stated requirement.

ACCEPTANCE CRITERION I.B.1.b-4:

The licensee must prescribe that all armed security personnel shall have no established medical history or medical diagnosis of epilepsy or diabetes, or, where such a condition exists, the individual shall provide medical evidence that the condition can be controlled with proper medication so that the individual will not lapse into a coma or unconscious state while performing assigned security.

ACCEPTANCE CRITERION I.B.1.b-5:

The licensee must prescribe that all armed security personnel shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction, or, where such a condition has existed, the individual shall provide certified documentation of having completed a rehabilitation

program which would give a reasonable degree of confidence that the individual would be capable of performing assigned security duties.

ACCEPTANCE CRITERION I.B.1.b-6:

The licensee must prescribe that the ability of armed security personnel to perform their assigned crucial security tasks while wearing corrective lenses, hearing aids or while afflicted with mild color vision defects will be demonstrated prior to assignment. The requirement can be met by the crucial task demonstrations required in the qualification section (II.B).

ACCEPTANCE CRITERION I.B.1.b-7:

The licensee must prescribe that any armed security personnel who have been incapacitated by a serious condition to the extent they cannot perform their security duties will be required to provide, prior to resumption of security duties, medical evidence of recovery.

2.3.2 MENTAL QUALIFICATION (App. B, I.B.2)

2.3.2.1 GENERAL MENTAL QUALIFICATIONS (App. B, I.B.2.a)

ACCEPTANCE CRITERION I.B.2.a-1:

The licensee must identify for each security assignment the job tasks, standards and as appropriate conditions that represent the spoken, reading and writing skills required by the assignment (if any). The licensee may reference tasks, standards and conditions contained in the qualification section of the plan. The plan must commit that before being assigned an

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individual will demonstrate the communication tasks identified to the standards and under the conditions contained in the plan.

Successful performance demonstration of the tasks identified in the qualification section of the plan requires individuals to possess the following mental qualities identified in paragraph I.B.2.a of 10 CFR 73 Appendix B:

- ° mental alertness
- ° capability to exercise your judgment, implement instructions and assimilate assigned security tasks.

Therefore, no specific reference to these mental qualities is required in the Training and Qualification Plan.

#### 2.3.2.2 PROFESSIONAL MENTAL EXAMINATION (App. B, I.B.2.b)

##### ACCEPTANCE CRITERION I.B.2.b-1:

The licensee must prescribe that a person professionally trained to identify emotional instability will have determined and attested that the central alarm station operators and armed members of the security organization have no emotional instability condition that would interfere with the performance of the crucial tasks associated with the individual's assigned duties. The use of tests is acceptable provided the final determination is made by a person professionally trained to identify emotional instability.

2.3.2.3 CONTINUED OBSERVATION (App. B, I.B.2.c)

ACCEPTANCE CRITERION I.B.2.c-1:

The licensee must prescribe that the security supervisors, as part of their normal duties, observe their security personnel to detect any indication of emotional instability.

ACCEPTANCE CRITERION I.B.2.c-2:

The licensee must commit that indications of emotional instability observed by a security supervisor shall be subject to verification by a licensed person trained to identify emotional instability. The plan must commit that the individual will not be allowed to return to his or her security duties unless the examiner attests that the examination detected no condition that would interfere with the performance of the examinee's assigned crucial security tasks.

2.4 PHYSICAL FITNESS QUALIFICATION (App. B, I.C)

ACCEPTANCE CRITERION I.C-1:\*

The licensee must identify for each armed security assignment a set of physically demanding job tasks, standards and conditions (performance objectives) and a time period during which this set of tasks must be performed. The following is a list of typical physical demands of the type to be considered:

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\* See Appendix C for rationale.

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- (a) lifting
- (b) carrying
- (c) pulling
- (d) climbing
  - (1) stairs
  - (2) ladders
- (e) crawling
- (f) running

This set of tasks and period of performance must represent one of the most physically demanding day-to-day and contingency situations that may be encountered during assignment performance. The task condition statements must specify the personnel equipment to be carried during task performance. The licensee may reference the tasks and associated standards and conditions contained in the qualification section of the plan. If performance objectives are identified that are not job tasks the licensee must demonstrate their job relevance.

REVIEW PROCEDURE:

The set of tasks will be reviewed against the assignments responsibilities to insure that they represent the most physically demanding tasks performed. The condition statement will be reviewed to insure that the equipment is consistent with the duty assignment. In addition, the physically demanding tasks submitted by other sites will be surveyed. Based on comparison of the results of this survey with site specific

requirements, a site may be questioned on the applicability of other tasks or combinations of tasks and requested to resubmit more demanding tasks.

ACCEPTANCE CRITERION I.C-2:

The licensee must commit that prior to assignment to an armed security position, an individual will demonstrate his or her physical fitness qualification by successfully performing all the tasks identified (performance objectives) within the period of time under the conditions and to the standards specified. The licensee must also commit that the results of qualification testing will be documented and attested by the licensee security supervisor in accordance with Acceptance Criterion II.B-5.

2.5 CONTRACT SECURITY PERSONNEL (App. B, I.D)

ACCEPTANCE CRITERION I.D-1:

The licensee must commit that all contract security personnel shall meet the suitability, physical and mental commitments contained in the plan submitted by the licensee. The responsibility for verifying the adequacy of contractor programs to meet these requirements rests with the applicant or licensee.

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2.6 PHYSICAL REQUALIFICATION (App. B, I.E)

ACCEPTANCE CRITERION I.E-1:

The licensee must commit that central-alarm-station operators and armed security personnel will be required at least every 12 months to pass a physical examination in accordance with Acceptance Criterion I.B.1.b-1. The licensee must commit that armed security personnel will, at least every 12 months, be required to meet vision and hearing requirements in accordance with Acceptance Criterion I.B.1.b-2 and I.B.1.b-3 and to demonstrate their physical fitness in accordance with Acceptance Criterion I.C.-2.

2.7 DOCUMENTATION (App. B, I.F)

ACCEPTANCE CRITERION I.F-1:

The licensee must commit that results of the suitability and the physical and mental qualification procedures will be documented at the site. The documents actually completed during the examinations or demonstrations need not be retained.

2.8 TRAINING AND QUALIFICATION PLAN (App. B, II)

2.8.1 TRAINING REQUIREMENTS (App. B, II.A)

ACCEPTANCE CRITERION II.A-1:

The licensee must outline the training program to be used to train security personnel who require training to perform assigned security related tasks or duties.

ACCEPTANCE CRITERION II.A-2:

The licensee must describe the means of maintaining personnel and force effectiveness for contingency response tasks that are not performed during day-to-day operations (e.g., responding to an attack) and provisions for upgrading qualifications of security personnel in areas where deficiencies have been observed.

2.8.2 QUALIFICATION REQUIREMENTS (App. B, II.B)

ACCEPTANCE CRITERION II.B-1:\*

The licensee must identify by security assignment the crucial security tasks required to implement the licensee physical security or contingency plan. Security qualification is required for individuals who have full time security duties, other individuals having response force assignments part time and individuals whose assignments are specifically identified in the contingency plan responsibility matrix. Terms such as "observer" are not considered specific assignments. A security task is considered crucial if:

- (a) Its proper performance is essential for successful implementation of the site Physical Security and Contingency Plans when needed, even if it is performed only during contingencies.

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\* See Appendix C for rationale.

AND

- (b) It is not simple and an individual could make mistakes involving lack of knowledge, skills or ability that affect security. That is, these tasks are not of minimal difficulty and there is a probability of deficient performance.

REVIEW PROCEDURE:

- (1) The reviewer will confirm that each shift and task assignment identified in the T&Q plan are the same as or equivalent to operational elements cited in the Contingency Plan or the fulltime security and part-time response positions identified in the site security organization as described in the Physical Security Plan. If there is not a one-to-one relationship the T&Q plan must show how the assignments in the T&Q plan relate to the positions and operational elements committed to in the licensee's Physical Security Plan and Contingency Plan.
- (2) The reviewer will confirm that each decision-action contained in a licensee's responsibility matrix of his Contingency Plan has corresponding crucial tasks identified in the licensee's Training and Qualification Plan. All the tasks required to complete the decision-actions identified in the licensee's Contingency Plan are assumed crucial to licensee's event responses, except those simple security tasks of minimal difficulty, or those with little probability of deficient performance.

The reviewer will confirm that tasks involving initiating event (cue) recognition and initial response are identified as crucial where cue recognition is essential for successful implementation of the site Physical Security and Contingency Plans.

(3) The reviewer will confirm that the licensee has identified all crucial tasks required to implement the licensee's Physical Security Plan. At a minimum, this confirmation will assure that the licensee has identified the crucial security tasks implementing licensee commitments like utilization of security equipment, communications, LLEA coordination, access control, monitoring protected and vital areas, search, patrol and escort.

All specific commitments in the licensee's Physical Security Plan performed by members of the security organization as defined in the Physical Security Plan are assumed crucial to site security except those of minimal difficulty or of low probability of deficient performance.

As an aid in completing review procedures 2 and 3, the reviewer will compare each site identified task list against a security task inventory that is based on all available sources and sorted by security functions.

In comparing this task list with site identified tasks, omission of tasks can be justified by:

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1. differences in site procedures and equipment
2. physical layout and environmental differences
3. MASP and Contingency Plan commitment differences
4. differences in security force composition, numbers, and assignments
5. local operational and legal constraints
6. site operational status:
  - a. operating reactors
  - b. construction on-site
7. differences in LLEA agreements
8. LLEA response time
9. other site specific considerations

ACCEPTANCE CRITERION II.B-2:\*

Each licensee provided task statement will:

- (1) Contain a verb and object,
- (2) Be observable, and
- (3) Be measurable.

REVIEW PROCEDURES

The reviewer will confirm that each licensee provided job task statement:

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\* See Appendix C for rationale.

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(1) Is a statement of a highly specific action which contains a verb and object and that describes a job action.

(2) "Is observable" so that by observing the performance of the job holder, or the results of his efforts, a definite determination can be made that the task has been performed.

(3) "Is measurable", so that a technically proficient individual can observe the performance of the task, or the product produced by the task and be able reasonably to conclude that the task has or has not been properly performed.

For example, verbs such as: appreciate, comprehend, understand, conclude, know, supervise, think, etc., are neither observable nor measurable. Certain verbs, such as grasp, may have multiple meanings depending on their usage (i.e., grasp the stick, or grasp the meaning) and should be avoided in this context or clarified.

The task statements should be couched in site job language.

ACCEPTANCE CRITERION II.B-3:

The licensee must commit that all personnel who have full time security duties, other individuals have response force assignments part time and individuals whose assignments are specifically identified in the contingency plan responsibility matrix will have successfully performed, before assignment, all the crucial security tasks identified for that

security assignment, under the conditions, and to the standards specified in the Training and Qualified Plan.

ACCEPTANCE CRITERION II.B-4:

The licensee must commit that the security personnel qualification records will be available at the site.

ACCEPTANCE CRITERION II.B-5:

The licensee must commit that the qualification record will contain attestation by a security supervisor, that performance of all crucial tasks associated with the examinee's assigned duties have been successfully demonstrated. The attesting supervisor is responsible for proper documentation and is responsible for its veracity. Further, for each crucial task the record will contain the date of successful performance, the signature of the observing individual (security supervisor or his/her designated representative) and the initials of the examinee. The applicant or licensee is not required to retain the detailed materials completed for each individual during the qualification, such as completed tests or rating forms.

ACCEPTANCE CRITERION II.B-6:

The licensee must commit that a copy of each item of detailed material developed to assure reliable and objective task demonstrations (tests) is available at the site.

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2.8.3 CONTRACT PERSONNEL (App. B, II.C)

ACCEPTANCE CRITERION II.C-1:

The licensee must commit that all contract security personnel will meet the same qualification requirements as do the licensee's employees with respect to their security assignments. The licensees must commit that the qualification of contract personnel will be documented and attested to in accordance with Acceptance Criterion II.B-5.

The responsibility for verifying the adequacy of the contractor personnel qualification rests with the applicant or licensee.

2.8.4 SECURITY KNOWLEDGE, SKILLS, AND ABILITIES (App. B, II.D)

ACCEPTANCE CRITERION II.D-1:\*

Any licensee specified task conditions (equipment, material or environmental influence) must be conditions which influence performance of the security tasks.

REVIEW PROCEDURE

Reviewers will confirm that the conditions statements accurately reflect:

- (1) tools and equipment used to perform the task, or
- (2) special job aids or manuals, or

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\* See Appendix C for discussion.



- (3) kind and amount of supervision, or
- (4) special physical demands of the task, or
- (5) environmental conditions that influence task completion, or
- (6) location of performance, or
- (7) cues that initiate action.

Conditions should be job related conditions and not conditions inserted for test administration purposes without relation to what may actually be expected on the job. Detailed conditions are not required. Task Conditions must be controllable by the licensee (i.e., lightning, fog, outside support like LLEA, are not acceptable since they are not under licensee control). Conditions may be summarized for multiple tasks which are performed under the same conditions. Conditions need not be specified for all task statements (except as required by criterion II.D-2), but if none are specified it is assumed that performance is under all normal job conditions.

ACCEPTANCE CRITERION II.D-2:

Cues (initiating events) must be specified for tasks for which cue recognition and initial response determines success or failure of the tasks.

ACCEPTANCE CRITERION II.D-3:\*

The licensee must specify a task standard for each task identified in the plan.

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\* See Appendix C for rationale.

ACCEPTANCE CRITERION II.D-4 \*

The licensee must provide a job task standard that is observable, is measurable in quality or quantity and against which successful performance of each task can be assessed.

REVIEW PROCEDURE

The reviewer will confirm that:

- (1) Each standard is observable and measurable.
- (2) No standard contradicts commitments made in the site's physical security and/or contingency plans.
- (3) Each standard specifies a product and/or process quality and/or quantity by which acceptable task performance can be assessed.

If the standard is a process, all crucial sub-tasks must be stated, unless a procedure is referenced and measurable and observable sub-tasks that summarized the procedure are provided and that represent a minimum level of acceptable performance. A summary is not required for procedures that have already been summarized in the site physical security plan or by the decisions/actions in the contingency plan. However, in these cases the other plans must be referenced to insure coverage.

- (4) The standard is a job related standard and not a test administration standard.

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\* See Appendix C for rationale.

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## GUIDELINES FOR DOCUMENTING TASK CONDITIONS

ITEM THAT MAY BE INCLUDED IN STATEMENT OF TASK CONDITIONS	EXAMPLES
1. Tools and equipment used to perform the task.	<ol style="list-style-type: none"> <li>1. Gas Mask</li> <li>2. Weapon</li> <li>3. Flashlight</li> <li>4. Radio</li> </ol>
2. Special job aids and manuals.	<ol style="list-style-type: none"> <li>1. Procedural checklists</li> <li>2. Technical manuals</li> <li>3. SOP</li> <li>4. Post Orders</li> </ol>
3. Kind and amount of supervision and assistance normally available during task performance.	<ol style="list-style-type: none"> <li>1. Job holder performs task without assistance from others.</li> <li>2. Task performed under close supervision.</li> <li>3. Task performed as a member of a team.</li> </ol>
4. Special physical demands of the task.	<ol style="list-style-type: none"> <li>1. Crowded working conditions.</li> <li>2. Running</li> <li>3. Climbing</li> <li>4. Crawling</li> </ol>
5. Deliverable Environmental conditions that influence task completion.	<ol style="list-style-type: none"> <li>1. Temperature</li> <li>2. Night/Day</li> </ol>
6. Location of performance.	<ol style="list-style-type: none"> <li>1. Air conditioned building.</li> <li>2. Outdoors in all weather conditions.</li> <li>3. CAS</li> </ol>
7. Cues (initiating event)	<ol style="list-style-type: none"> <li>1. Radio Message</li> <li>2. Observation of _____</li> <li>3. Metal detector alarm annunciation.</li> <li>4. Telephone bomb threat</li> </ol>

Figure 2

- (5) The standard is go/no go (not referenced to class performance).
- (6) Time standards are provided for time-constrained tasks.

Differential standards, as a function of experience are acceptable to allow for consideration of the greater experience. However, any specific commitments in the site approved MASP and Contingency Plan must not be violated.

#### 2.8.5 REQUALIFICATION (App. B, II.E)

##### ACCEPTANCE CRITERION II.E-1:

The licensee must commit that security personnel will be requalified at least every 12 months to perform their assigned crucial security tasks and duties in accordance with the NRC approved licensee Training and Qualification Plan and Acceptance Criterion II.B.3. Requalification must be within 12 months of its last demonstration as documented in the task qualification record.

##### ACCEPTANCE CRITERION II.E-2:

The licensee must commit that the results of the requalification must be documented and attested by a licensee security supervisor in accordance with Acceptance Criteria II.B-4, II.B-5 and II.B-6.

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ACCEPTANCE CRITERION III-1:\*

The licensee shall identify, for each site weapon, either a task and standard from the qualification requirements (Section II.B) or a course of fire from the weapons qualification requirements (Section IV) that prescribe a standard for each of the following subject areas:

- (1) Mechanical assembly, disassembly, range penetration capability of weapon, and bullseye firing
- (2) Weapons cleaning and storage
- (3) Combat firing, day and night
- (4) Safe weapons handling
- (5) Cleaning, loading, unloading, and reloading
- (6) When to draw and point a weapon
- (7) Rapid fire techniques
- (8) Close quarters firing
- (9) Stress firing
- (10) Zeroing

REVIEW PROCEDURE

Review the tasks or courses of fire identified in order to confirm that each has a standard that addresses the subject areas and for the site weapons.

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\* See Appendix C for reference.

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The reviewer will confirm that:

(a) "Bullseye firing" includes single-action handgun firing. The bullseye firing requirement for the rifle and shotgun is met by the courses of fire specified in Section IV of Appendix B.

(b) "Combat firing day and night" for the handgun includes double-action firing and the use of combat handgun position (met by the Practical Pistol Course (PPC) or the National Police Course (NPC) cited in Section IV). In addition, if the individual may be required to use a weapon while wearing a protective mask, familiarization firing while wearing the mask must be identified. The night firing requirement is met by the night familiarization (Acceptance Criterion IV-1). Combat firing for the rifle includes rapid fire and combat positions (met by the rifle course of fire cited in Section IV).

(c) "When to draw and point a weapon" includes target recognition and reaction. This requirement need not be demonstrated on the range and is independent of weapon.

(d) "Rapid firing techniques" includes handgun double-action timed fire (met by NPC or PPC). The rapid fire requirement for the shotgun and rifle is met by the course of fire required in Section IV of Appendix B.

(e) "Close quarters firing" includes handgun quick-draw firing from hip (crouch) (met by PPC and NPC). "Close quarters firing" for the shotgun includes hip fire (met by the shotgun course cited in Section IV).

(f)\* "Stress firing" includes firing the weapon after physical exertion to illustrate the effects of physical stress on his or her marksmanship. The firing need not be for score.

(g) "Zeroing of assigned weapon," is applicable to the rifle only.

2.10 WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM (App. B, IV)

ACCEPTANCE CRITERION IV-1:

The licensee must confirm that all individuals assigned to positions which require armed personnel will receive night familiarization on their assigned weapons.

2.10.1 HANDGUN (App. B, IV.A)

ACCEPTANCE CRITERION IV.A-1:

The licensee must confirm that armed personnel shall qualify with a revolver or semiautomatic pistol firing the National Police Course, or an equivalent nationally recognized course. Qualifying score shall be an accumulated total of 70 percent of the maximum obtainable score. The PPC is considered an equivalent nationally recognized course. To be equivalent a course must include double action timed combat firing using the following positions:

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\* See Appendix C for discussion.

- (a) crouch (close quarter firing)
- (b) standing no support
- (c) prone
- (d) barricade (strong/weak hand)
- (e) kneeling

and firing at ranges up to 25 yards.

#### 2.10.2 SEMIAUTOMATIC RIFLE (App. B, IV.B)

##### ACCEPTANCE CRITERION IV.B-1:

The licensee must commit that armed security personnel, assigned to use the semiautomatic rifle by the licensee, shall qualify with semiautomatic rifle by firing the 100-yard course of fire specified in Section 17.5(1) of the National Rifle Association, High Power Rifle Rules book (effective March 15, 1976), or a nationally recognized equivalent course of fire. Qualifying score shall be an accumulated total of 80 percent of the maximum obtainable score.

The Department of Energy (DOE) day rifle course outlined below is considered a nationally recognized equivalent course of fire and would be acceptable.

479 078



DOE Day Rifle Course

	<u>Range</u>	<u>No. of Rounds</u>	<u>Position</u>	<u>Time</u>	<u>Target</u>
Stage 1	100 yds	5	Standing	30 seconds	B-27
Stage 2	100 yds	5	Kneeling	30 seconds	B-27
Stage 3	100 yds	5	Sitting	30 seconds	B-27
Stage 4	100 yds	<u>5</u>	Prone	30 seconds	B-27

Total 20 rounds

Firing Stages 1-4 - Semiautomatic mode of fire; no artificial support; iron sights; time begins with shooter in firing position, magazine with 5 rounds loaded in weapon, first round unchambered.

2.10.3 SHOTGUN (App. B, IV.C)

ACCEPTANCE CRITERION IV.C-1:

The licensee must commit the armed security personnel, assigned to use the 12 gauge shotgun by the licensee, shall qualify with a full choke or improved, modified choke, 12 gauge shotgun firing the course specified in Section IV.C of Appendix B to 10 CFR 73. To qualify, the individual shall be required to place 50 percent of all pellets within the black silhouette.

479 079

2.10.4 REQUALIFICATIONS (App. B, IV.D)

ACCEPTANCE CRITERION IV.D-1:

The licensee must commit that all armed security personnel shall be requalified on the weapon with which armed at least every 12 months in accordance with the NRC approved licensee Training and Qualifications Plan, and in accordance with Acceptance Criteria IV.A-1, IV.B-1, and IV.C-1.

2.11 GUARD, ARMED RESPONSE PERSONNEL, AND ARMED ESCORT EQUIPMENT (App. B, V)

ACCEPTANCE CRITERION V-1:\*

The equipment specified in the licensee approved Physical Security Plan meets this requirement and it does not have to be addressed in the Training and Qualifications Plan.

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\* See Appendix C for discussion.

479 080

APPENDIX A

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APPENDIX A

STANDARD LICENSEE QUESTIONS OR REQUESTS

1. 73.55 (b) (4) IMPLEMENTATION SCHEDULE

- 1.1 Provide a Training and Qualification Plan implementation schedule that shows how all security personnel will be qualified within 2 years of Training and Qualification Plan approval.
- 1.2 State the number of days following plan approval at which qualification of personnel will begin.
- 1.3 State the number of days following plan approval at which all personnel will be qualified.

2. SUITABILITY (App. B, I.A)

- 2.1 Provide a commitment that, prior to employment or assignment to the security organization, an individual will possess a high school diploma or pass an equivalent performance examination designed to measure basic job related mathematical, language and reasoning skills, ability, and knowledge, required to perform security job duties.
- 2.2 Provide a commitment that, prior to employment, or assignment to the security organization, an individual has no felony convictions involving the use of a weapon and no felony convictions that reflect on the individual's reliability.

2.3 Describe the process used to verify the accuracy of information used to determine an individual's suitability.

2.4 Describe the process used to verify that an individual assigned to the security organization has no felony convictions involving the use of a weapon or that reflects on his or her reliability.

2.5 Describe the process used to verify that an individual assigned to an armed position is the age specified in Appendix B or older.

3. GENERAL PHYSICAL QUALIFICATIONS (App. B, I.B.1.a)

3.1 Describe how the site will assure that security personnel have no physical weakness or abnormalities which would adversely affect performance of assigned duties.

4. PHYSICAL EXAMINATION (App. B, I.B.1.b)

4.1 Provide a commitment that armed security personnel and central alarm station operators must successfully pass a physical examination administered by a licensed physician or licensed health professional trained to administer physical examinations.

4.2 Commit that following the physical examination of the armed security personnel and central alarm operators that the physician must attest that he or she detected no condition that renders the individual incapable of performing the crucial tasks identified for the examinee's assignments.

4.3 Commit that armed security personnel shall meet the following vision requirement(s).

- ( ) Distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses.
- ( ) If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall carry an extra pair of corrective lenses.
- ( ) Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye.
- ( ) Field of vision must be at least 70° horizontal meridian in each eye.
- ( ) The ability to distinguish red, green, and yellow colors is required.
- ( ) Loss of vision in one eye is disqualifying.
- ( ) Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means, provided such medications as may be used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to

perform assigned security job duties, and provided the visual acuity and field of vision requirements stated above are met.

( ) Where corrective eyeglasses are required, they shall be of the safety glass or plastic type.

4.4 Commit that armed security personnel shall meet the following hearing requirement(s):

( ) Shall have no hearing loss in the better ear greater than 30 decibels averaging at 500 Hz, 1000 Hz, and 2000 Hz, with no level greater than 40 decibels at any one frequency (by ISO 1964 or ANSI 1969 audiometry).

( ) Individuals who require a hearing aid to meet the hearing requirement will demonstrate their auditory acuity to or above the levels stated in Appendix B.

4.5 Commit that armed personnel shall have no established medical history or medical diagnosis of epilepsy or diabetes, or, where such a condition exists, the individual shall provide medical evidence that the condition can be controlled with proper medication so that the individual will not lapse into a coma or unconscious state while performing assigned security job duties.

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- 4.6 Commit that armed personnel shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction, or, where such a condition has existed, the individual shall provide certified documentation of having completed a rehabilitation program which would give a reasonable degree of confidence that the individual would be capable of performing assigned security job duties.
- 4.7 Commit that the ability of armed individuals, who wear corrective lenses, to perform their assigned crucial security tasks while wearing corrective lenses will be demonstrated.
- 4.8 Commit that the ability of armed individuals, who wear hearing aids, to perform their assigned crucial security tasks while wearing a hearing aid will be demonstrated.
- 4.9 Commit that the ability of an armed individual to perform his or her crucial security tasks while affected with mild color vision defects will be demonstrated.
- 4.10 Commit that armed individuals who have been incapacitated by a serious illness to the extent they cannot perform their duties will be required to provide, prior to resumption of security duties, medical evidence of recovery.

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5. GENERAL MENTAL QUALIFICATIONS (App. B, I.B.2.a)

5.1 Identify for each security assignment the job communication, task, standards and as appropriate that represent the spoken, reading and writing skills required by the assignment.

5.2 Commit that before being assigned an individual will demonstrate the communication tasks identified to the standards and under the conditions contained in the plan.

6. PROFESSIONAL MENTAL EXAMINATION (App. B, I.B.2.b)

6.1 Commit that a person professionally trained to identify emotional instability will determine and attest that the central alarm station operators and armed individuals have no emotional instability condition that would interfere with the performance of the crucial tasks associated with their assigned duties.

7. CONTINUED OBSERVATION (App. B, I.B.2.c)

7.1 Commit that the security supervisors, as part of their normal duties, observe their personnel to detect any indication of emotional instability.

7.2 Commit that indications of emotion instability shall be subject to verification by a licensed person trained to identify emotional instability.

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7.3 Commit that an individual suspected of emotional instability will not be allowed to return to duty unless the examiner attests that the examination detected no condition that would interfere with the performance of the examinee's assigned crucial security tasks.

8. PHYSICAL-FITNESS QUALIFICATION (App. B, I.C)

8.1 Identify for each armed assignment a set of job tasks, standards and conditions (performance objectives) and specify a period of time during which all the tasks will be performed. This set of tasks and period of performance must represent one of the most physically demanding day-to-day and contingency situations that may be encountered during job performance.

8.2 Specify a period of time during which the examinee must complete all the physical fitness performance objectives.

8.3 Demonstrate the job relevance of the performance objectives in your physical fitness qualification program.

8.4 Demonstrate the job relevance of the time standard in your physical fitness program.

8.5 Provide justification for non-inclusion of the following tasks as representing one of the most physically demanding situations encountered during assignment as a \_\_\_\_\_.

8.6 Provide confirmation that prior to assignment to an armed position an individual will demonstrate his or her physical fitness qualification by successfully completing all the physical fitness objectives (tasks, conditions, standards) within the specified period of time.

8.7 Provide confirmation that the results of the physical fitness demonstration will be documented and attested to by the licensee security supervisor in accordance with Acceptance Criterion II.B-5.

9. CONTRACT SECURITY PERSONNEL (App. B, I.D)

9.1 Commit that all contract security personnel will meet the same suitability and physical and mental requirements as the licensee's employees.

10. PHYSICAL REQUALIFICATION (App. B, I.E)

10.1 Commit that the central alarm station operators and armed individuals will be required at least every 12 months to pass a physical examination in accordance with Acceptance Criterion I.B.1.b-1.

10.2 Commit that armed personnel will at least every 12 months meet vision and hearing requirements in accordance with Acceptance Criteria I.B.1.b-2 and I.B.1.b-3.

10.3 Commit that armed personnel will at least every 12 months demonstrate their physical fitness in accordance with Acceptance Criterion I.C.2.

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11. DOCUMENTATION (App. B, I.F)

11.1 Commit that the results of the suitability and the physical and mental qualification procedures will be documented at the site.

12. TRAINING REQUIREMENTS (App. B, II.A)

12.1 Outline the security training program to be conducted at your site.

12.2 Describe the means of maintaining personnel and force effectiveness for contingency response tasks that are not performed day-to-day.

13. QUALIFICATION REQUIREMENTS (App. B, II.B)

13.1 The following task is assigned to the \_\_\_\_\_ in your \_\_\_\_\_ plan and is assigned to the \_\_\_\_\_ in your Training and Qualification Plan, resolve the apparent inconsistency.

13.2 Identify for the following assignment titles, equivalent titles in your:

( ) (a) Contingency Plan Responsibility Matrix

( ) (b) Physical Security Plan, security organization sections.

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- 13.3 Identify the crucial tasks performed by the \_\_\_\_\_.
- 13.4 Correct the following task statements so that they contain both a verb and object describing job actions.
- 13.5 Correct the following task statements so that they are made observable and measurable.
- 13.6 Correct the following statement to form a task statement. As stated it is not a task but is a:
- ( ) duty
- ( ) function
- ( ) decision/action
- 13.7 Provide justification for non-inclusion of the following tasks, or include them as modifications to your qualification requirements.
- 13.8 Identify the assignments and crucial tasks, conditions, and standards required to implement the following decision-actions contained in your responsibility matrix for \_\_\_\_\_ (event).
- 13.9 Identify the assignments and crucial tasks, conditions and standards involving cue recognition and initial response for the following initiating events (cues):

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- 13.10 Identify the assignments, crucial tasks, conditions, and standards for implementing the commitments made in sections \_\_\_\_\_ of your Physical Security Plan concerning \_\_\_\_\_.
- 13.11 Commit that all personnel who have full time security duties, other individuals having response force assignments part time, and individuals whose assignments are specifically identified in the contingency plan responsibility matrix will successfully perform, before assignment, all the crucial security tasks identified for those assignments, under the conditions, and to the standards specified in the training and qualified plan.
- 13.12 Commit that the qualification record of each individual assigned security related duties will be available at the site.
- 13.13 Commit that:
- ( ) the qualification record will contain attestation by a security supervisor, that performance of all crucial tasks associated with the examinee's assigned duties have been successfully demonstrated.
  - ( ) for each crucial task the record will contain the date of successful performance, the signature of the observing individual (security supervisor or his/her designated representative) and the initials of the examinee.

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13.14 Commit that a copy of each item of detailed materials developed to assure reliable and objective task demonstrations (tests) are available at the site.

14. CONTRACT PERSONNEL (App. B, II.C)

14.1 Commit that all site contract security personnel will meet the same training, equipment and qualification requirements as the licensee's employees as appropriate to their assigned duties.

14.2 Commit that the qualification of contract personnel will be documented and attested to in accordance with Acceptance Criterion II.B-5.

15. SECURITY KNOWLEDGE, SKILLS, AND ABILITIES (App. B, II.D)

15.1 Correct the following task conditions statements so that they identify only those job related conditions that significantly influences task performance.

15.2 Correct the following task conditions to eliminate all specifications that are not under your direct control.

15.3 Provide the initiating cue for the following tasks for which cue recognition is essential for performance.

479 093

- 15.4 Correct the following task conditions statements so that they are compatible with the commitments section of your \_\_\_\_\_ plan concerning \_\_\_\_\_.
- 15.5 Correct the following task standards statements specifications to include observable and measurable qualities or quantities.
- 15.6 Provide a standard for the following task statements in your submittal.
- 15.7 Make the following task standards compatible with the commitments made in Section(s) \_\_\_\_\_, of your
- ( ) (a) Physical security plan
- ( ) (b) Contingency Plan.
- 15.8 Provide measurable and observable sub-tasks that summarize the "procedures" referenced in the following tasks and/or standards and that represent a minimum level of acceptable performance.
- 15.9 Confirm (or modify) the following task standards as an actual Job standard and not a test administrative standard or requirement.
- 15.10 Modify the following task standards to make them go/no go.



15.11 Provide time standards for the following time-constrained tasks.

15.12 Provide more detailed standards for the following tasks.

16. REQUALIFICATION (App. B, II.E)

16.1 Commit that all security personnel will be requalified at least every 12 months in accordance with the NRC approved licensee Training and Qualification Plan.

16.2 Commit that the results of the requalification will be documented and attested by a licensee security supervisor in accordance with the commitments contained in NRC approved licensee Training and Qualification Plan.

17. WEAPONS TRAINING (App. B, III)

17.1 Identify for the following areas the task and standard from the qualification requirements or the course of fire that prescribes a standard for the (weapon) \_\_\_\_\_ :

( ) Mechanical assembly and disassembly

( ) Range penetration capability of weapon

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- ( ) Single action handgun firing
- ( ) Weapons cleaning and storage
- ( ) Double-action firing and use of combat positions
- ( ) Safe weapons handling
- ( ) Clearing, loading, unloading, and reloading
- ( ) Target recognition and reaction
- ( ) Rapid fire techniques
- ( ) Close quarter firing
- ( ) Stress firing
- ( ) Zeroing.

18. WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM (App. B, IV)

- 18.1 Commit that all individuals assigned to armed positions will receive night familiarization on their assigned weapons.

- 18.2 Commit that all armed individuals will qualify with a handgun by successfully firing the Practical Pistol Course (PPC) or National Police Course.
  
- 18.3 Demonstrate that the handgun qualification course of fire identified in your plan is equivalent to the National Police Course.
  
- 18.4 Commit that personnel assigned to use the semiautomatic rifle by the licensee training and qualifications plan, shall qualify with a semi-automatic rifle by firing the 100-yard course of fire specified in Section 17.5(1) of the National Rifle Association, High Power Rifle Rules book (Effective March 15, 1976),\* or a nationally recognized equivalent course of fire.
  
- 18.5 Demonstrate that the rifle qualification course of fire identified in your plan is equivalent to that identified in Appendix B, IV.B.
  
- 18.6 Commit that semiautomatic rifle course that the:
  - ( ) targets used shall be as stated in Section 8.2 for the 100-yard course
  
  - ( ) time limits for individuals shall be as specified in Section 8.2 of the NRA rule book, regardless of the course fired.

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( ) qualifying score shall be an accumulated total of 80% of the maximum obtainable score.

18.7 Commit that individuals assigned to use the 12 gauge shotgun by the licensee training and qualifications plan shall qualify with a full choke or improved modified choke 12 gauge shotgun firing the following course:

<u>Range</u>	<u>Position</u>	<u>No. Rounds</u> <sup>1</sup>	<u>Target</u> <sup>2</sup>
15 yds.	Hip fire Point	4	B-27
25 yds.	Shoulder	4	B-27

<sup>1</sup>The 4 rounds shall be fired at 4 separate targets within 10 seconds using 00 gauge (9 pellet) shotgun shells.

<sup>2</sup>As set forth by the National Rifle Association (NRA) in its Official Rules and Regulations, "NRA Target Manufacturers Index," December 1976.

18.8 Commit that to qualify on the shotgun course the individual shall be required to place 50% of all pellets (36 pellets) within the black silhouette.

18.9 Commit that individuals shall be weapons requalified at least every 12 months in accordance with the NRC approved licensee training and qualifications plan.

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APPENDIX B

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APPENDIX B

EVALUATION FINDINGS

10 CFR 73.55(b)(4)

1. Implementation Schedule

The licensee has provided a schedule that shows that all security personnel will be qualified within 2 years after the plan is approved by the NRC.

Based on our review, we conclude that the Training and Qualification Plan implementation schedule and procedures met the requirements of 10 CFR 73.55(b)(4) and is acceptable.

10 CFR 73, Appendix B

2. Suitability

Prior to employment, or assignment to the licensee security organization, an individual will meet the following suitability criteria:

- a. Educational Development--possess a high school diploma or pass an equivalent performance examination designed to measure basic job related mathematical, language and reasoning skills, ability, and knowledge, required to perform security job duties.

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- b. Felony Convictions--have no felony convictions involving the use of a weapon and no felony convictions that reflect on the individual's reliability.

Prior to employment or assignment to the licensee security organization in an armed capacity, an individual, will be 21 years of age or older.

The licensee will verify the accuracy of the information used to determine an individual's suitability.

Based on our review, we conclude that the Training and Qualification Plan meets the suitability criteria of Section I.A of 10 CFR 73, Appendix B and is acceptable.

### 3. PHYSICAL AND MENTAL QUALIFICATION

The licensee will monitor his security personnel to assure that an individual gives no indication that he or she can not meet the physical demands associated with his or her assigned security duties.

Licensee armed personnel and central alarm station operators shall successfully pass a physical examination administered by a licensed physician a licensed professional trained to conduct physical examinations. A licensed physician will attest that examination detected no condition that renders the examinee incapable of performing his or her security assignments.

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Armed members of the licensee security organization shall meet the following physical requirements:

(1) Vision

- (a) For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses. If uncorrected distance vision is not at least 20/40 in the better eye, the individual shall carry an extra pair of corrective lenses. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye. Field of vision must be at least 70° horizontal meridian in each eye. The ability to distinguish red, green and yellow colors is required. Loss of vision in one eye is disqualifying. Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means, provided such medications as may be used for controlling glaucoma do not cause undesirable side effects which adversely affect the individual's ability to perform assigned security job duties, and provided the visual acuity and field of vision requirements stated above are met. On-the-job evaluation shall be used for individuals who exhibit a mild color vision defect.
- (b) Where corrective eyeglasses are required, they shall be of the safety glass or plastic type.



(c) The use of corrective eyeglasses or contact lenses shall not interfere with an individual's ability to effectively perform assigned security job duties during normal or emergency operations.

(2) Hearing

(a) Individuals shall have no hearing loss in the better ear greater than 30 decibels average at 500 Hz, 1000 Hz, and 2000 Hz, with no level greater than 40 decibels at any one frequency (by ISO 1964 or ANSI 1969 audiometry).

(b) A hearing aid is acceptable provided suitable testing procedures demonstrate auditory acuity equivalent to the above stated requirement.

(c) The use of a hearing aid shall not decrease the effective performance of the individual's assigned security job duties during normal or emergency operations.

(3) Diseases--Individuals shall have no established medical history or medical diagnosis of epilepsy or diabetes, or, where such a condition exists, the individual shall provide medical evidence that the condition can be controlled with proper medication so that the individual will not lapse into a coma or unconscious state while performing assigned security job duties.

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- (4) Addiction--Individuals shall have no established medical history or medical diagnosis of habitual alcoholism or drug addiction, or, where such a condition has existed, the individual shall provide certified documentation of having completed a rehabilitation program which would give a reasonable degree of confidence that the individual would be capable of performing assigned security job duties.
- (5) Other Physical Requirements--An individual who has been incapacitated due to a serious illness, injury, disease, or operation, which could interfere with the effective performance of assigned security job duties shall, prior to resumption of such duties, provide medical evidence of recovery and ability to perform such security job duties.

Individuals whose security tasks and job duties are directly associated with the effective implementation of the licensee physical security and contingency plans shall demonstrate during qualification mental alertness and the capability to exercise good judgment, implement instructions, assimilate assigned security tasks, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, audible, visible, or other signals required by assigned job duties.

A person professionally trained to identify emotional instability will determine that the central alarm station operators and armed members of the security organization have no emotional instability that would interfere with the individuals job performance.

The responsible supervisors will continuously observe their security personnel for indications of emotional instability. Identification of emotional instability identified by supervisors will be verified by a licensed professional trained to identify emotional instability and who must attest that the examinee has no condition that would interfere with the individual's job performance before the examinee is reassigned.

Based on our review, we conclude the Training and Qualification Plan meets the physical and mental criteria of Section I.B of 10 CFR 73, Appendix B and is acceptable.

4. PHYSICAL FITNESS QUALIFICATIONS

The licensee guards, armed response personnel and armed escorts will demonstrate the physical fitness required for their assigned security job duties by performing a practical physical exercise program within a specific time period. This program represents one of the most physically demanding day-to-day and response situation that may be performed by that individual. Based on our review, we conclude that the Training and Qualification Plan meets the physical fitness qualification criteria of Section I.C 10 CFR 73, Appendix B and is acceptable.

5. CONTRACT SECURITY PERSONNEL

Licensee employed contract security personnel will meet all the suitability, physical and mental criteria contained in Appendix B. Based on our review, we

conclude that the Training and Qualification Plan meets the contract security personnel criteria of Section I.D of 10 CFR 73, Appendix B and is acceptable.

6. PHYSICAL REQUALIFICATION

At least every 12 months, the licensee central alarm station operators and armed members of the security organization will pass a physical examination administered by a licensed physician who will attest that he or she found no condition that renders the individual incapable of performing his or her security duties. At least every 12 months, the armed members of the security organization will demonstrate they can meet the entry level vision, hearing and physical fitness qualification detailed in sections 3 and 4 of the findings. Based on our review, we conclude that the Training and Qualification Plan meets the physical requalification criteria of Section I.E of 10 CFR 73, Appendix B and is acceptable.

7. DOCUMENTATION

The licensee or his agent will document the results of the suitability, physical and mental qualification test and examination. Based on our review, we conclude that the Training and Qualification Plan meets the documentation criteria of Section I.F of 10 CFR 73, Appendix B and is acceptable.

8. TRAINING REQUIREMENTS

The licensee will conduct training at the site to maintain security employee proficiency on contingency response tasks. Based on our review, we conclude that the Training and Qualification Plan meets the training criteria of Section II.A of 10 CFR 73, Appendix B and is acceptable.

9. QUALIFICATION REQUIREMENTS

The licensee has identified by shift assignment the tasks crucial to implementation of the site physical security and contingency plans. Each person prior to shift assignment will demonstrate his or her ability to perform all the assignments crucial tasks to the standards and under the conditions identified in the plan. The security supervisor will attest that the individuals have successfully demonstrated the tasks identified for their assignments. The licensee will document the date of successful task performance, signature of the observing individual (security supervisor or his/her designated representative) and the initials of the examinee. Based on our review, we conclude that the Training and Qualification Plan meets the qualification criteria of Section II.B of 10 CFR 73, Appendix B, and is acceptable.

10. CONTRACT PERSONNEL

Contract security personnel will meet the same equipment, training and qualification criteria as licensee employees as appropriate to their assigned

duties. Based on our review, we conclude that the Training and Qualification Plan meets the contract criteria of Section II.C of 10 CFR 73, Appendix B and is acceptable.

11. SECURITY KNOWLEDGE, SKILLS AND ABILITIES

The licensee has specified for each crucial task identified in the plan an observable and measurable standard by which successful task performance can be assessed. The standards identified are compatible with the successful implementation of the site Physical Security and Contingency Plans. Based on our review, we conclude that the Training and Qualification Plan meets the security knowledge, skills and abilities criteria of Section II.D of 10 CFR 73, Appendix B and is acceptable.

12. REQUALIFICATION

Licensee security personnel will be requalified at least every 12 months to perform assigned security related job tasks and duties for both normal and contingency operations. Requalification will be in accordance with the NRC approved licensee Training and Qualifications Plan. The results of requalification shall be documented and attested by a licensee security supervisor. Based on our review, we conclude that the Training and Qualification Plan meets the requalification criteria of Section II.E of 10 CFR 73, Appendix B and is acceptable.

13. WEAPONS TRAINING

Licensee guards, armed response personnel and armed escorts shall meet prescribed standards in the following areas for his or her assigned weapon(s):

1. Mechanical assembly, disassembly, range, penetration capability of weapon, and bullseye firing
2. Weapons cleaning and storage
3. Combat firing, day and night
4. Safe weapons handling
5. Clearing, loading, unloading, and reloading
6. When to draw and point a weapon
7. Rapid fire techniques
8. Close quarter firing
9. Stress firing
10. Zeroing assigned weapon(s)

Based on our review, we conclude that the Training and Qualification Plan meets the weapons training criteria of Section III of 10 CFR 73, Appendix B and is acceptable.

14. WEAPONS QUALIFICATION AND REQUALIFICATION PROGRAM

All individuals assigned to armed positions at the licensee site will receive night familiarization on their assigned weapons. Licensee guards, armed escorts and armed response personnel shall qualify with a revolver or semi-automatic pistol firing, during the day, on the Practical Police Course. Qualifying score shall be an accumulated total of 70% of the maximum obtainable score.

Licensee guards, armed escorts and armed response personnel, assigned to use the semiautomatic rifle by the licensee shall qualify with a semiautomatic rifle by firing during the day the 100-yard course of fire specified in Section 17.5(1) of the National Rifle Association, High Power Rifle Rules Book (Effective March 15, 1976). Targets used shall be as stated in Section 17.5 for the 100-yard course. Time limits for individuals shall be as specified in Section 8.3 of the NRA rule book, regardless of the course fired. Qualifying score shall be an accumulated total of 80% of the maximum obtainable score.

Licensee guards, armed escorts, and armed response personnel assigned to use the 12 gauge shotgun by the licensee shall qualify with a full choke or improved modified choke 12 gauge shotgun firing, during the day, the following course:

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<u>Range</u>	<u>Position</u>	<u>No. Rounds</u> <sup>1</sup>	<u>Target</u> <sup>2</sup>
15 yds.	Hip fire Point	4	B-27
25 yds.	Shoulder	4	B-27

<sup>1</sup>The 4 rounds shall be fired at 4 separate targets within 10 seconds using 00 gauge (9 pellet) shotgun shells.

<sup>2</sup>As set forth by the National Rifle Association (NRA) in its Official Rules and Regulations, "NRA Target Manufacturers Index," December 1976.

To qualify the individual shall be required to place 50% of all pellets (36 pellets) within the black silhouette.

Individuals will be weapons requalified at least every 12 months in accordance with the NRC approved licensee Training and Qualifications Plan.

The results of the weapons qualification and requalification will be documented by the licensee or his agency. Based on our review, we conclude that the Training and Qualification Plan meets the weapons criteria of Section IV of 10 CFR 73, Appendix B and is acceptable.

#### 15. CONCLUSIONS

Based on our evaluation of the licensee's Training and Qualification Plan, we conclude that the licensee meets the requirements of 10 CFR 73(b)(4), and 10 CFR 73, Appendix B.

APPENDIX C

APPENDIX C

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ACCEPTANCE CRITERIA I.A-2:

OTHER FEDERAL RESTRICTIONS ON RECEIPT, POSSESSION OR TRANSPORTATION OF FIREARMS

In addition to the Appendix B suitability requirements for armed personnel the licensee should be aware of the following:

TITLE 18, UNITED STATES CODE - APPENDIX

Section 1202. Receipt, possession, or transportation of firearms--Persons liable; penalties for violations

(a) Any person who--

- (1) has been convicted by a court of the United States or of a State or any political subdivision thereof of a felony, or
- (2) has been discharged from the Armed Forces under dishonorable conditions, or
- (3) has been adjudged by a court of the United States or of a State or any political subdivision thereof of being mentally incompetent, or
- (4) having been a citizen of the United States has renounced his citizenship, or
- (5) being an alien is illegally or unlawfully in the United States, and who receives, possesses, or transports in commerce or affecting commerce, after the date of enactment of this Act, any firearm shall be fined not more than \$10,000 or imprisoned for not more than two years, or both.

(b) Any individual who to his knowledge and while being employed by any person who--

- (1) has been convicted by a court of the United States or of a State or any political subdivision thereof of a felony, or
- (2) has been discharged from the Armed Forces under dishonorable conditions, or
- (3) has been adjudged by a court of the United States or of a State or any political subdivision thereof of being mentally incompetent, or

- (4) having been a citizen of the United States has renounced his citizenship, or
  - (5) being an alien is illegally or unlawfully in the United States, and who, in the course of such employment, receives, possesses, or transports in commerce or affecting commerce, after the date of the enactment of this Act, any firearm shall be fined not more than \$10,000 or imprisoned for not more than two years, or both.
- (c) As used in this title--
- (1) "commerce" means travel, trade, traffic, commerce, transportation, or communication among the several States, or between the District of Columbia and any State, or between any foreign country or any territory or possession and any State or the District of Columbia, or between points in the same State but through any other State or the District of Columbia or a foreign country;
  - (2) "felony" means any offense punishable by imprisonment for a term exceeding one year, but does not include any offense (other than one involving a firearm or explosive) classified as a misdemeanor under the laws of a State and punishable by a term of imprisonment of two years or less;
  - (3) "firearm" means any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; the frame or receiver of any such weapon; or any firearm muffler or firearm silencer; or any destructive device. Such term shall include any handgun, rifle, or shotgun;
  - (4) "destructive device" means any explosive, incendiary, or poison gas bomb, grenade, mine, rocket, missile, or similar device; and includes any type of weapon which will or is designed to or may readily be converted to expel a projectile by the action of any explosive and having any barrel with a bore of one-half inch or more in diameter;
  - (5) "handgun" means any pistol or revolver originally designed to be fired by the use of a single hand and which is designed to fire or capable of firing fixed cartridge ammunition, or any other firearm originally designed to be fired by the use of a single hand;
  - (6) "shotgun" means a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder and designed or redesigned and made or remade to use the energy of the explosive in a fixed shotgun shell to fire through a smooth bore either a number of ball shot or a single projectile for each single pull of the trigger;

- (7) "rifle" means a weapon designed or redesign, made or remade, and intended to be fired from shoulder and designed or redesigned and made or made to use the energy of the explosive in a fixed tallic cartridge to fire only a single projectile through rifled bore for each single pull of the trigger.

ACCEPTANCE CRITERIA I.C-1:

RATIONALE FOR: IDENTIFICATION OF PHYSICALLY DEMANDING JOB TASKS, STANDARDS AND CONDITIONS

Appendix B, I.C. states:

"The exercise program performance objectives shall be described and shall consider such ... as they pertain to each individual's assigned security."

Mager(1) has identified three essential characteristics of performance objectives as follows:

1. They identify the terminal behavior. The statement of an objective must identify exactly what the trainee must be able to do at the end of an instructional unit or complete course of instruction to demonstrate that he has achieved the desired behavior. The learned behavior may involve the application of knowledge or the demonstration of a specific skill or constellation skills.
2. They describe the conditions of performance. The statement of a performance objective must describe clearly and completely the conditions under which the trainee must be able to demonstrate the behavior. That is, the conditions of the objective identify what the trainee will be given to use in doing the job (tools, equipment, job aids, references, materials), what he will be denied (tools, equipment and the like), what assistance he will have (if any), what supervision will be provided, and the physical environment in which he must perform (climate, space, light, and the like).

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(1) Robert F. Mager, Preparing Objectives for Programmed Instruction. Palo Alto, Calif.: Fearon Publishers, 1962, p. 12.

3. They set a criterion of acceptable performance. The statement of a performance objective must describe how well the trainee must be able to perform. The criterion or standard establishes the minimum performance requirements for a duty, task, or job element. To do this, the objective statement must prescribe the quality of the work product or service produced (accuracy, completeness, clarity, tolerances, and the like); the quantity of work products produced (the number of work units completed); the time allowed to complete the job, duty, task, or element; or any combination of quality, quantity, and time standards."

Therefore, the performance objective specifies the action or task performed, conditions and standards. The physical demands identified for consideration were identified by the Department of Labor.(2)

In addition, the performance objectives must represent job situations. The NRC must not require objectives whose job relevance has not been demonstrated (pull-up, etc.). TITLE 29 Labor, Chapter XIV - Equal Employment Opportunity Commission (EEOC) Part 1607 - Uniform Guidelines on Employment Selection Procedures (1978), II Adverse Impact, states,

"If adverse impact exists, it must be justified on grounds of business necessity. Normally, this means by validation which demonstrates the relation between the selection procedure and performance on the job."(3)

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(2) U.S. Department of Labor, Handbook for Analyzing Jobs, 1972, p. 338.

(3) 43 FR 38291

ACCEPTANCE CRITERIA II.B-1:

RATIONALE FOR: IDENTIFICATION BY SHIFT ASSIGNMENT OF THE CRUCIAL JOB TASKS

10 CFR 73, Appendix II.B states:

"Each person who performs security related job tasks or job duties required to implement the licensee physical security or contingency plans shall, prior to being assigned to such tasks or duties, be qualified in accordance with the .... approved .... plan."

In addition, Appendix B, II.D. states,

"Each individual assigned to perform the security related tasks identified in the licensee physical security or contingency plan shall demonstrate .... in accordance with the specified standards for each task as stated in the .... approved .... plan."

Paragraph II.B requires personnel to be qualified to perform their assigned tasks and duties and paragraph II.B requires that these tasks be identified in the plan along with standards. Therefore, the licensee must identify for each assignment the security tasks performed.

In addition, the following may further clarify the need for this information.

The U.S. Army TRADOC Pamphlet 350.30 states:

"Regardless of the route that you the ultimate end product, or output, must include a validated list of tasks that make up the job. These tasks must be described in sufficient detail to permit collection, of valid and reliable data for use in making decisions as to which tasks will be trained. In addition, for those tasks selected for training, sufficient information such as conditions, initiating cues, standards, and elements



must be collected and verified to provide a sound basis for developing Job Performance Measures (JPMs)."(4)

Title 29 Labor, Chapter XIV - EFOC Part 1607 - Uniform Guidelines on Employee Selection Procedures (1978), and Part 300 - Employment Section 14, paragraph B,2. "Analysis of the Job" states:

"There should be a review of job information to determine measures of work behavior(s) or performance that are relevant to the extent they represent critical or important job duty work behaviors or work outcomes as developed from job information."(5)

Tracy states:

"Training and development programs must be based on job data, not on what someone recalls that he did or thinks that a graduate should be able to do ... The method of obtaining these data is job or task analysis."(6)

Why are only the "crucial tasks" to be identified in the plan? If the site were to require formal qualification on all the tasks performed, it would be counter productive. Important resources would be wasted on non-important or trivial tasks.

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(4) U.S. Army TRADOC Pamphlet 350-30, pg. 34, PHASE I, (NTIS ORDER No. AD019487) National Technical Information Service, Springfield, Virginia 22161.

(5) 43 FR 38300, Aug. 25, 1978

(6) Tracey, W. R. Designing training and development systems. New York: American Management Association, Inc. 1971, pg. 86.

The Army states:

"Some tasks are seldom required on the job and only minimum job degradation would result if the tasks were not performed. On the other hand, some tasks are highly critical to successful job performance, and the complex nature of the task makes training essential. Economic and time considerations require a decision as to which tasks will be selected for training and which tasks will not."(7)

Title 29 Labor, Chapter XIV - EEOC Part 1607 - Uniform Guidelines on Employee Selection procedures, Technical standards Section 14, paragraph (3) Criterion measures, states:

"Whatever criteria (Standards) are used should represent important or critical (emphasis added) work behaviors or work outcomes."(8)

ACCEPTANCE CRITERIA II.B-2:

RATIONALE FOR: OBSERVABLE AND MEASURABLE TASK STATEMENTS

The task statement will be the basis for the qualification of individuals, therefore, it must be observable and measurable.

If you cannot see it performed or measure it when it is performed, how do you know it has been successfully demonstrated as required by Appendix B, II.D?

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(7) Op. cit., TRADOC, PHASE I, pg. 113.

(8) 43 FR 38300

The Army states:

"Task statements must be constructed carefully to assure that the final analysis yields useable job performance data. The following are characteristics of tasks and task statements:

1. A task statement is a statement of a highly specific action. The statement has a verb and object.  
.....
4. Tasks must be observable in that by observing the performance of the job holder or the results of his efforts a definite determination can be made that the task has been performed. ....
5. A task must be measurable; that is, in the real world, a technically proficient individual can observe the performance of the task or the product produced by the task and be able to conclude that the task has or has not been properly performed."(9)

ACCEPTANCE CRITERIA II.D-1:

RATIONALE FOR: SPECIFICATION OF JOB CONDITIONS:

Appendix B Specifications of task condition at the time of performance will assure that the factors influencing performance are held constant during the testing of all personnel. This greatly increases test fairness and reliability. If the conditions are not specified in the plan it will be assumed that the level of performance (standard) specified in the plan can be achieved under all normal job conditions.

Title 29 Labor, Chapter XIV - EEOC, Part 1607 - Uniform Guidelines on Employee Selection Procedures, Documentation of Impact and Validity evidence, paragraph (3) Job Analysis states:

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(9) op. cit. TRADOC, PHASE I, Pg. 13-14.

"The work situation should be described, including the setting in which work behavior(s) are performed, and where appropriate, the manner in which knowledge, skills, and abilities are used, and the complexity and difficulty of the knowledge, skill or ability as used in the work behavior(s)."(5)

ACCEPTANCE CRITERIA II.D-2, II.D-3:

RATIONALE FOR: SPECIFICATION OF MEASURABLE AND OBSERVABLE JOB STANDARDS

10 CFR 73, Appendix B, II.D states:

"Each individual assigned to perform a security related task identified in the licensee physical security or contingency plan shall demonstrate the required knowledge, skill, and ability in accordance with the specified standards for each task as stated in the NRC approved licensee training and qualification plan."

Therefore, it becomes mandatory that a standard be provided for each task named in the T&Q Plan.

Title 29 Labor, Chapter XIV - EEOC Part 1607 - Uniform Guidelines on Employee Selection Procedures (1978), Technical Standards Section 14, paragraph (3) Criterion measures, states:

"Whatever criteria (standards) are used should represent important or critical work behaviors or work outcomes."

The U.S. Army states:

"Standards, . . . , refers to the acceptable quality of performance of a task in the real-world job environment. The standard for a task is a statement of how well that task must be performed. Task standards are the basis for job performance measure standards (Qualification tests).

Standards must be sound statements of the standard of performance actually required on the job."(10)

"The standard of performance of a task can be defined by identifying an acceptable process, product or both." The standard should be defined in terms of an acceptable product if:

1. The product is observable and can be inspected.
2. The process by which the product was produced cannot be easily observed.
3. The process is relatively unimportant as compared to the product."(11)

It can be readily seen that security related tasks standards must be: (1) provided for each crucial task, (2) observable and measurable, and (3) definitive of product or process qualities and/or quantities that signal successful task completion.

ACCEPTANCE CRITERIA III-1:

RATIONALE FOR: WEAPONS STANDARDS SEE:

- o Police Reference Notebook, Section 5, Proficiency Areas, International Association of Chiefs of Police, 11 Firstfield Road, Gaithersburg, Maryland 20760.
- o Police Firearms Instructors Manual, NRA, 1600 Rhode Island Avenue, N.W., Washington, D.C. 20036

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(10) op. cit., TRADOC, PHASE I, pg. 24

(11) ibid, page 29

ACCEPTANCE CRITERIA III-1:

DISCUSSION OF STRESS FIRING REQUIREMENT

Tange states:

"Many serious confrontations encountered occurred at the climax of a chase. Trained police officers are aware of the difficulty of accurately firing a revolver on a controlled pistol range where all the factors for good marksmanship are present. In a police action involving a chase, the emotional tension and physical exertion will cause rapid heart beat, muscle tremors and irregular breathing. Couple the physical factors with poor lighting, irregular terrain, obstructed view and irregular movement of the target and it will be rapidly seen that accurate shooting under these conditions is extremely difficult. For this reason, an exertion course is recommended to make officers aware of the difficulties experienced while firing under stress situations.

The intention behind the use of the exertion course is to graphically illustrate to the officer the effects of physical stress on his marksmanship and the futility of firing his revolver while running. The course is designed to increase the heart beat and respiratory rates by running, and to induce an unsteadiness of the shooter's shooting hand.

Experiencing a decline in proficiency during physical stress will certainly produce an awareness on the part of the officer of his reduction in skill and accuracy with a firearm. It will also make him think of what measures he must take, mechanically, to compensate for such a loss."(12)

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(12) A Model Firearms Program for All Police Agencies: Can One Be Devised?, 2-74, D. E. Tange, Thesis, John Jay College of Criminal Justice of City University of New York, N.Y., N.Y. 10036, pg. 44

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ACCEPTANCE CRITERION V-1:

DISCUSSION OF EQUIPMENT REQUIREMENTS

Acceptance Criterion V-1 states that the equipment specified in the licensee approved Physical Security Plan meets the equipment requirements and you don't need to address this requirement in your Training and Qualification Plans. This is true, provided you have supplied a sufficient description of each item of personnel security equipment in your physical security plan. (By personnel security equipment we mean weapons and radios).

In the absence of sufficient equipment specification in your Physical Security Plan, you will be inspected against the equipment specification contained in Appendix B. This does not mean that you are required to have each item of equipment identified in Appendix B but that for each item of equipment you do have you must either describe it in your Physical Security Plan or it is assumed that it meets the specification as appropriate in Appendix B. For example, if you have riot shotguns at your site, but describe them only as shotguns in your plan then it will be assumed they meet the specification in Appendix B. In this case it would be assumed that the shotguns would have a full or modified ch Therefore, you must assure that either the weapons and radios identified in your Physical Security Plan meet the specification in Appendix B or that your Physical Security Plan contains sufficient detail to identify where your equipment differs from that specified in Appendix B.

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APPENDIX D

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QUESTION 1: What records must be maintained at the site to demonstrate compliance with the provisions of Section I (suitability and, physical and mental qualifications) of Appendix B?

Answer: The site is required to have available at the site, verification that each member of the security organization (contract and proprietary) has met the suitability, physical and mental requirements of Appendix B. The actual detailed results of an individual's suitability verification and or physical and mental examination are not required to be kept at the site.

QUESTION 2: How long are the qualification records required by Section II B of Appendix B to be maintained at site?

Answer: The records that document and attest that the individual (contract & proprietary) has met the qualification requirements contained in the NRC approved plan must be kept on site for the period of the individual's employment. One copy of each detailed item used during qualification such as tests or rating forms must be available at the site for 3 years. However, the licensee is not required to maintain any of the detailed materials completed during the individual's qualification such as an individual's completed test.

QUESTION 3: What is the training and qualification plan submission and implementation schedule for sites that do not have an operating license?

Answer: The schedule is outlined below:

- OL - FSAR (Security Plan) submitted prior to effective date of Appendix B (October 23, 1978) - Training and qualification plans should be submitted by August 18, 1979.
- OL - FSAR submitted after October 23, 1978 but prior to August 18, 1979 - Training and qualification plans should be submitted by August 18, 1979 or 300 days prior to fuel loading date whichever is later. All security personnel should be trained and qualified to the plan 24 months after NRC approval.
- OL - FSAR submitted after August 18, 1979 - Training and qualification plans should be submitted with FSAR. All security personnel should be trained and qualified prior to fuel loading.
- CP - Submit the training and qualification program outline and a commitment to Appendix B Part 73 with the PSAR application.

QUESTION 4: What provisions have been made for the transition from the training commitments contained in the site MASP, and the new Appendix B requirements?

Answer: The following guidance is provided:

1. Licensees must follow their approved security plans. (After February 23, 1979, power reactor security forces should be trained in accordance with their Modified Amended Security Plan - generally committing to meet R. G. 5.20). Any departure from the approved security plan must be formally documented in accordance with the provisions of 10 CFR 50.54(p).
2. A licensee may follow his training and qualification plan prepared to meet the requirements of Appendix B prior to licensing approval provided it meets or exceeds the requirements of his current physical security plan. However, this must be documented in accordance with the provisions of 10 CFR 50.54(p).
3. The licensees can change their commitment to qualify security personnel through formal classroom training and use examinations to establish the qualification of these personnel without prior approval of the NRC subject to the provisions of 10 CFR 50.54(p). The licensee (including his contractor) would be in compliance, provided the examination has assured that the examinee possesses requisite knowledge of the subject matter.

QUESTION 5: Is the Appendix B approach to personnel qualification acceptable for meeting the contingency plan training requirements contained in 10 CFR 50.54(p)?

Answer: The licensees can follow the training and qualification plan prepared to meet the Appendix B requirements prior to the plan approval by NRC to meet contingency plan training requirements contained in 10 CFR 50.54(p).

QUESTION 5: Can the training and qualification plan reference sections of the site contingency plan and MASP?

Answer: Referencing of any part of the site approved plans is acceptable provided these plans are available at the site for inspections. However, modifying the contingency plan or MASP to meet Appendix B requirements may result in an additional fee.

Question 7: Development and implementation of a training and qualification plan to meet the requirements of Appendix B is, as pointed out in the workshop, very time consuming. Therefore, using the Appendix B approach to meet the Contingency plan training requirements as suggested by the answer to question 5 may not be possible. Thus, can the requirement in 10 CFR 50.54(p) requiring that contingency training be completed prior to the contingency plan implementation be relaxed?

Answer: No

Question 8: Can NRR supply further assistance and guidance in the area of test development? Can arrangements be made, through the NRC, to make available the applicable military test techniques to the licensees?

Answer: We are investigating this possibility and hope we can provide this type of support before the training and qualification plan review is complete.

Question 9: Can arrangements be made to answer specific training and qualification plan questions prior to plan submittal?

Answer: Licensees will have an opportunity to ask specific questions concerning training and qualification development during the second day of the meeting scheduled for June 11-12, in Albuquerque, New Mexico.

Question 10: Is it acceptable to reference procedures in your qualification plan standards?

Answer: Procedures can be referenced provided a summary of the minimum items required for successful performance is included. This summary is not necessary if the procedures have already been summarized in the site physical security plan or by the decisions/actions in the contingency plan responsibility matrix. However, in these cases the other plans must be referenced to insure coverage.

Question 11: What portions of the training and qualification plan and test materials developed to complement the plan can be made available to the examinees?

Answer: The tasks and standards identified for individual qualification provide a valuable resource for the job holder or examinee. They identify the standards that must be maintained. Therefore, the pertinent task and standard information contained in the plan can be made available to the job holder. In addition, the specific performance requirements for hands-on-tests can also be given to appropriate individuals; however, written test materials must be secured.

Question 12: How will the site personnel be qualified during the two year training and qualification plan implementation period that follows plan approval?

Answer: During this implementation phase security personnel must be trained in accordance with the provisions of the approved MASP until portions are phased out by the training and qualification plan. If a site does not have an approved MASP at the time of training and qualification plan approval an interim training plan equivalent to that described in Reg. Guide 5.20 should be instituted until the training and qualification plan can be phased in. At no time should an individual be assigned to security duties until properly trained and or qualified.

Question 13: Must the training and qualification plan include the "duty descriptions" referred to in paragraph 2.2.2.5.2 (page 2-8) of NUREG 0219 and for which examples are shown on page 3-4 thru 3-11 of NUREG 0219?

Answer: We have determined that these descriptions do not add any additional information and therefore are not required to be part of your training and qualification plan.

Question 14: Should the licensee's submit all the tasks considered for inclusion in the training and qualification plan or only those chosen as sufficiently critical or crucial.

Answer: Only those tasks used for personnel qualification should be included in the training and qualification plan.

Question 15: How can we get a hard copy of "The Interservice Procedures for Instructional Systems Development"?

Answer: Call or write to the National Technical Information Service, Springfield, Virginia 22161, phone (703) 557-4660. The following order numbers should be used:

Executive Summary - AD019486  
Phase I: Analyze - AD019487  
Phase II: Design - AD019488  
Phase III: Develop- AD019489  
Phase IV/V: Implement/Control - AD019490

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QUESTION 16: In their training and qualification plan can the licensee commit to procedures to be followed if an individual is tested on-the-job and fails to demonstrate his or her ability to perform a crucial task?

Answer: If the training and qualification plan contains such a procedure it will be reviewed by NRR and if found acceptable it then becomes part of the approved plan and is therefore inspectable.

QUESTION 17: Can an individuals qualification records be destroyed after five years instead of being maintained at the site for the individuals period of employment?

Answer: Yes

QUESTION 18: Can the test materials developed to implement the site training and qualification plan include administrative test items that are for site use and that are not intended to test crucial tasks?

Answer: Yes, but these items must be clearly designated as not being part of the test for crucial tasks.

QUESTION 19: There are federal government requirements that require that a percentage of employees be from minority categories, but we are also under stringent requirements for qualification of security force personnel. Which set of requirements would tend to weigh more heavily on our situation?

Answer: NRR knows of no federal requirement that would prevent a site from qualifying its security personnel in accordance with the requirements in Appendix B and as detailed in NUREG 0219 and at the training and qualification workshops. The "Uniform Guidelines and Employment Selection Procedures (1978)" (43 FR 38291) states "If adverse impact exists, it must be justified on grounds of business necessity. Normally, this means by validation which demonstrates the relation between the selection procedures and performance on the job". The Guidelines go on to discuss in detail how the relationship between employment procedures and the job is demonstrated. The NRC training and qualification requirements are built on the same concepts, specifically, conducting a job analysis to identify what is required to perform the job (job analysis) and secondly developing a valid test of the individuals capabilities to perform these job requirements. However, meeting the requirements in the Guidelines may require a more rigid and detailed application of these concepts, to include test validation, than that required by the NRC.

QUESTION 20: Must site personnel, who are assigned to a security-related post only in the event of a security force strike, be trained and qualified?

Answer: Yes

QUESTION 21: The responsibility matrix seems to be of extreme importance and value to the total Training Plan. Is it really that vital or is its role being over-emphasized?

Answer: Appendix B requires the licensee to identify, for each assignment, the tasks crucial to implementation of the site physical security and contingency plans. The matrix format of presenting this information appears to be the most economical; however, it is no more critical than other elements of the required information.

QUESTION 22: Should plan submittals be organized identically to that outlined in the workbook?

Answer: The plan in the workbook was developed to show how the workshop products can be used in developing your training and qualification plans. Therefore, the references to workshop products such as the responsibility matrix or the job analysis worksheets are not applicable if you are using a different format to supply the information required by paragraphs II.B and II.D of Appendix B. Remember to meet the requirements of these two paragraphs your plan must: (1) identify, for each task, the job standards and condition of performance, (2) identify, by shift assignment, the crucial tasks performed, (3) commit to qualify individuals to these standards and conditions prior to assignment, (4) commit to keep the appropriate records and (5) commit to keep a copy of all test material developed.

Except for the qualification section the index in the workbook follows the contents of Appendix B. This is how the NRC review will also be conducted; therefore, organizing your plan in the same order as the requirements in Appendix B (as shown in index) will be a great convenience to both your site and to the NRC reviewer.

QUESTION 23: What exactly is meant by Test Materials?

Answer: The information contained in your training and qualification plan represents the results of defining the job (job analysis). In order to properly qualify your personnel the job information in your plan (tasks, standards, & conditions) must be transformed into tests. The materials developed to do this are the test materials referred to in the workshop and set forth in NUREG 0219. They could include items such as:

(1) detailed test conditions, (2) detailed test criteria, such as, check lists, rating forms, actual written tests and grading forms etc., (3) examinee instructions and (4) examiner instructions.



QUESTION 24: What is the full meaning and intent of Question 7 which was sent out in the April 10, 1979 letter?

Answer: The question in our April 10, 1979 letter was phrased as it was to show the NRC was aware of the problems involved.

QUESTION 25: Must the type of test (hands-on or written) used to qualify individuals be identified in the plan?

Answer: No. This type of information will be subject to changes as the site qualification program matures and should not be in the plan. Therefore, the training and qualification plan should not include the test development blueprint (Form 2-2 in latest version of workbook).

QUESTION 26: What criteria will IE use to assess the adequacy of the Contingency Plan procedures required by Appendix C to 10 CFR 73 but not subject to NRR review?

Answer:

IE will first determine if the procedures exist. The second step will be to ensure that the procedures are complete and they detail and reflect the information contained in the site approved contingency responsibility matrix. Criteria to determine adequacy of these procedures will be developed in the future.

QUESTION 27: On what basis will IE inspect a site training and qualification program that has been modified in accordance with the provisions of 10 CFR 50.54(p)?

Answer:

IE will inspect against the NRC approved plan. If no decrease in effectiveness has been made, IE will accept the change as being inspectable. If a decrease has occurred, the licensee will be cited. The inspector will ensure that the record keeping and notification requirements of 10 CFR 50.54(p) have been complied with. If there is any difference of opinion as to the adequacy of the program subsequent to the change, or whether any decrease in effectiveness occurred, IE will forward the matter to NRR for their resolution.

QUESTION 28:

If a member of the security organizations is tested on a task identified in the approved training and qualification plan as crucial for their assignment and fails what is his or her status?

Answer:

If the individual is not actually on duty at the time of the failure he or she must successfully demonstrate an ability to perform the task (pass the test) prior to an assignment requiring performance of the task being tested. If the individual fails while on duty one of the following procedures must be followed:

1. The individual is instructed at once on his or her deficient performance and retested.
2. During the remainder of the shift the individual is restricted to the performance of tasks for which he or she has been qualified. The individual must be requalified on the failed task prior to reassignment.
3. The individual is removed from the post and the appropriate compensatory measures taken. This option is taken if neither option 1 nor 2 can be implemented without a decrease in the level of security at the site. The individual must be requalified on the failed task prior to reassignment to the post.

NRC FORM 335 (7-77)		U.S. NUCLEAR REGULATORY COMMISSION BIBLIOGRAPHIC DATA SHEET		1. REPORT NUMBER (Assign if by DDC) NUREG 0576	
4. TITLE AND SUBTITLE (Add Volume No., if appropriate) Nuclear Power Reactor Security Personnel Training & Qualification Plan Reviewer Workbook (Interim)				2. (Leave blank)	
7. AUTHOR(S)				3. RECIPIENT'S ACCESSION NO.	
9. PERFORMING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code) Reactor Safeguards Development Branch Division of Operating Reactors U.S. Nuclear Regulatory Commission Washington, DC 20555				5. DATE REPORT COMPLETED MONTH: July   YEAR: 79	
12. SPONSORING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code)				DATE REPORT ISSUED MONTH: July   YEAR: 79	
				6. (Leave blank)	
				8. (Leave blank)	
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