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## INSPECTION PROCEDURE 41500

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### TRAINING AND QUALIFICATION EFFECTIVENESS

Effective Date: January 15, 2026

PROGRAM APPLICABILITY: 2515 Appendix C

#### 41500-01 INSPECTION OBJECTIVES

- 01.01 Observe the performance of nuclear power plant workers to determine if they have been trained and qualified commensurate with the performance requirements of their jobs.
- 01.02 Evaluate the methods of licensee training and qualification (e.g., classroom, laboratory, simulation device, and on-the-job) to determine if the training and qualification program has been developed, implemented and evaluated using the Systems Approach to Training (SAT).
- 01.03 Evaluate the effectiveness of the implementation of the SAT.

#### 41500-02 GENERAL GUIDANCE

This inspection procedure (IP) will be used to assess nuclear power plant personnel training and qualification programs when:

1. This procedure is referenced by a supplemental IP performed in accordance with Inspection Manual Chapter (IMC) 2515, Appendix B, "Supplemental Inspection Program." This procedure will be referenced when training or qualification problems have caused or contributed to licensee performance problems, or training and qualification are assessed as part of the extent of condition.
2. When a licensee's training program accreditation is withdrawn and as authorized by the Regional Administrator in accordance with IMC 2515, Appendix C, "Special and Infrequently Performed Inspections."
3. In response to allegations in accordance with the NRC Allegation Manual. If hours are charged to this procedure, it must be authorized by the Regional Administrator in accordance with IMC 2515, Appendix C, "Special and Infrequently Performed Inspections."

This procedure may be referenced at any time while performing other IPs. When this procedure is referenced, the inspectors should charge hours to a baseline, reactive, or supplemental IP.

If this procedure is performed (hours charged to this procedure), then the performance must be authorized by the Regional Administrator in accordance with IMC 2515, Appendix C, "Special and Infrequently Performed Inspections." The authorization to perform the inspection should specify the scope of the inspection and the resource estimate, commensurate with the

licensee's performance issues. The NRC will consider the status of training program accreditation when determining the scope of inspection.

A change in the status of a training program's accreditation (i.e., "probation") should not be the sole basis for performance of this procedure. If a training program loses accreditation, the licensee will provide justification that the program complies with 10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel," and 10 CFR Part 55, "Operators' Licenses." The NRC will produce an inspection plan as part of the inspection authorization. The NRC will consider the licensee's performance problems, any supplemental inspections performed or planned in response to those performance problems, and any justification that the licensee provides so that the inspection is commensurate with the performance problems and the inspection is performed at an appropriate periodicity until accreditation is restored. After the first inspection, and at least yearly, the NRC will re-evaluate the scope and periodicity of the inspections.

Do not duplicate INPO and National Academy training documents, or the contents of those documents, in the inspection plan or other regulatory documents. Instead, refer to the licensee's training program documents if necessary. The Memorandum of Agreement (MOA) with the Institute of Nuclear Power Operations (INPO), dated December 1, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23026A093), Appendix Three, "Observation and Coordination Plan for NRC/INPO Training-related Activities," states, in part:

To avoid "codifying" or the appearance of "codifying" INPO documents, the NRC will not issue documents that duplicate INPO and National Academy training documents and will not refer to INPO and National Academy documents as a means of satisfying NRC requirements. Exceptions to this policy for control of proprietary and confidential INPO and National Academy documents will be addressed by the NRC and INPO on a case-by-case basis.

The NRC should perform an independent observation of training program activities when this procedure is referenced or entered. OEDO Procedure 0220, "Coordination with the Institute of Nuclear Power Operations," Revision 3 (ML102560529) states, in part:

INPO findings, recommendations, and corrective actions should not be referenced in NRC inspection reports, end-of-cycle reviews, Plant Issues Matrices, or other agency documents unless the issue is of such safety significance that no other reasonable alternative is acceptable. INPO findings, recommendations, and the licensee's corrective actions for these items should not normally be tracked by the NRC. If the issue warrants tracking, it should be independently evaluated, documented, and tracked as an NRC issue.

This IP references the systems approach to training (SAT), which is required by 10 CFR 50.120 for certain categories of plant personnel. The SAT is also referenced for licensed operators in 10 CFR Part 55. Because a finding in the Reactor Oversight Process (ROP) may be related to personnel training or qualifications not covered by regulations, this procedure can also assess any SAT-based personnel training not covered by 10 CFR 50.120 or 10 CFR Part 55.

Attachment 1 of this procedure provides background and considerations related to training program accreditation and accreditation probation and withdrawal. As also discussed in Attachment 1, accredited training programs are Commission-approved, so the program can form the basis for regulatory action, if necessary.

If the Board withdraws accreditation because a plant is permanently ceasing operations and not due to performance problems, then this IP does not apply. This IP is not intended to provide guidance for new and unaccredited training and qualification programs. Those programs would be inspected with IP 41501, "Part 52, Review of Training and Qualification Programs."

#### 41500-03 INSPECTION REQUIREMENTS

**Use NUREG-1220, "Training Review Criteria and Procedures," to evaluate the effectiveness of the licensee's training and qualification programs.**

##### Specific Guidance

NUREG-1220 provides guidance for evaluating the licensee's SAT process. The scope of the evaluation should be limited to the scope of the known performance issues or as necessary to evaluate the extent of condition of known performance issues.

#### 41500-04 RESOURCE ESTIMATES

If this procedure is referenced, the resources for this procedure are subject to the IP that references this procedure. If this procedure is performed, the resources shall be as authorized by the Regional Administrator in accordance with IMC 2515, Appendix C, "Special and Infrequently Performed Inspections." See the General Guidance section of this procedure for more guidance.

END

Attachment 1: Training Program Accreditation  
Attachment 2: Revision History for IP 41500

## Attachment 1: Training Program Accreditation

### Purpose

This attachment provides background regarding INPO's periodic training program review and determination of a licensee's training program accreditation rating.

### Background

Title 10 CFR 55.4, "Definitions," defines SAT. Title 10 CFR Part 50.120, "Training and Qualification of Nuclear Power Plant Personnel," requires licensees to establish, implement, and maintain training programs based on a SAT. The positions covered by this regulation are (1) non-licensed operator, (2) shift technical advisor, (3) shift supervisor, (4) instrument and control technician, (5) electrical maintenance personnel, (6) mechanical maintenance personnel, (7) radiation protection technician, (8) chemistry technician, and (9) engineering support personnel (formerly technical staff and managers). Requalification programs for licensed operators are developed using SAT, in accordance with 10 CFR 55.59(c).

Regulatory Guide 1.8 (RG 1.8), "Qualification and Training of Personnel for Nuclear Power Plants," provides a historical discussion of training and qualification policy statements, court decisions, and regulations. The regulatory guide describes a method acceptable to satisfy the training and qualification regulations.

As stated in the Statement of Considerations for the 1987 final rule amending 10 CFR Part 55 (Volume 52 of the Federal Register (FR), page 9456 (52 FR 9456); March 25, 1987), subject to continued Commission endorsement of the industry's accreditation process under the Final Policy Statement on Training and Qualification of Nuclear Power Plant Personnel (50 FR 11147; March 20, 1985), a facility licensee's training program would be considered a "Commission-approved training program" if it is accredited by the National Nuclear Accrediting Board (NNAB). To be accredited by the NNAB, a facility licensee's training program must, among other things, implement the National Academy for Nuclear Training (NANT) guidelines. The NRC, through a Memorandum of Agreement (MOA) with the Institute of Nuclear Power Operations (INPO), dated December 1, 2022 (ML23026A093), reviews changes to these guidelines and the accreditation objectives and criteria.

The MOA between the NRC and INPO documents the expectations for NRC and INPO training-related activities. While not an enforceable agreement, per the MOA, it provides useful background and expectations for regulatory activity. Appendix Number Three, "Observation and Coordination Plan for NRC/INPO Training-Related Activities," states, in part:

The NRC recognizes National Academy accreditation and associated training evaluation activities (see also Appendix Number Two, "Observation and Coordination Plan for NRC/INPO Inspection and Evaluation Activities") as an acceptable means of self-improvement in training. Such recognition encourages industry initiative and reduces evaluation and inspection activities. The NRC recognizes that accreditation is a means but not a requirement for meeting the requirements of 10 CFR Part 50.120, "Training and qualification of nuclear power plant personnel," and 10 CFR Part 55, "Operators' licenses."

The MOA also states, in part:

The NRC will assess the effectiveness of the industry's training and qualification program improvements as follows: [...] conduct performance-based inspections of training and qualification program effectiveness, as necessary and consistent with 10 CFR 50.120 and the NRC Inspection Manual.

The Operator Licensing and Human Factors Branch (IOLB) in the Office of Nuclear Reactor Regulation (NRR) maintains a document describing the history of the training rule (ML16257A453).

### Training Accreditation Process

The National Academy Board can (1) grant initial accreditation or renew accreditation of a program, (2) place a program on probation for a specified period of time, or (3) withdraw accreditation of a program. The licensee resolves training program weaknesses by preparing corrective action plans that are monitored by INPO.

### Accreditation Probation

Although the Board's action of placing a training program on probation indicates a Board concern, it does not necessarily place a training program in noncompliance with either 10 CFR Part 55 or 10 CFR Part 50.120 since training programs are accredited to a "standard of excellence" rather than a minimum level of regulatory compliance. If the Board withdraws accreditation, the NRC shall review the circumstances leading to the withdrawal to ensure safe operations and continued compliance with regulations.

Before determining its response to the issues that resulted in training program probation for a specific program, the NRC will review the concerns raised by the Board. Refer to OEDO Procedure 0220, "Coordination with the Institute of Nuclear Power Operations," Revision 3 (ML102560529). In doing the review, NRC staff will read INPO's accreditation report and discuss the issues with the licensee to determine the safety significance of the training deficiencies. Per the MOA with INPO, dated December 1, 2022 (ML23026A093), INPO's mission is to "promote excellence." Therefore, the issues that led to probation may not be safety significant. If the NRC determines that the issues that led to probation are not safety significant, it will not need to take further action. If the NRC determines that the issues that led to probation are safety significant, further action will be taken in accordance with the NRC Inspection Manual. The NRC staff documents the results of this safety review in the resident inspector's inspection report by stating that the accreditation report was reviewed.

Licensed operator requalification program inspections will be conducted as scheduled, even if a licensee's training programs have been placed on probation.

### Accreditation Withdrawal

The Board may withdraw accreditation in response to deficiencies in a utility's accredited training program. While the Board has not yet withdrawn accreditation of a program, it would result in a situation where the NRC would no longer be assured that the licensee is in compliance with the regulations. In the absence of accreditation, the licensee would be

responsible to describe how compliance is being maintained or being restored. The corrective actions should be commensurate with the significance of the performance issues, and should be included in the description of compliance. While it is expected that this procedure would be performed to verify compliance, it is also possible that the performance problems are of very low safety significance and the staff does not need to act further.

END

Attachment 2: Revision History for IP 41500

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML20044E578 01/15/26 CN 26-001	Updated 1995 procedure to reference ROP. Modified the inspection thresholds to match current MOAs with INPO, EDO procedures, NRC IMCs, and interfaces with other IPs. Allowed procedure to be referenced as-needed by other inspections, especially supplemental inspections. Modified the actions for accreditation withdrawal so that the licensee can propose how they will comply with regulations, and the NRC can generate an inspection plan to fit the performance issues and the licensee's plan for compliance.	None	ML22090A274