### **NRC INSPECTION MANUAL**

**IRAB** 

### INSPECTION MANUAL CHAPTER 1245 APPENDIX A

BASIC-LEVEL TRAINING AND QUALIFICATION JOURNAL

Effective Date: 09/24/21

### Table of Contents

ntroduction	1
Required Basic-Level Training Courses	3
Basic-Level Individual Study Activities	
(ISA-1) History and Organization of the U.S. Nuclear Regulatory Commission	
(ISA-2) Navigating the NRC Internal and External Web Sites	
(ISA-3) Inspector Objectivity, Protocol, and Professional Conduct	12
(ISA-4) Fitness-for-Duty Rule	15
(ISA-5) Allegations	17
(ISA-6) NRC's Response to an Incident at a Nuclear Facility	20
(ISA-7) The Enforcement Program	23
(ISA-8) The Office of Investigations	26
(ISA-9) Exploring the Operating Reactor Inspection Program and the Reactor Oversight	
Program's Internal Web Page	28
(ISA-9a) Exploring the Reactor Construction Inspection Program and the Construction	
Reactor Oversight Program's Internal Web Page	32
(ISA-10) Performance Indicator Program	
(ISA-11) Augmented Inspection Team, Special Inspection Team, and Incident Inspection	n
Team Activities	37
(ISA-12) Understanding How the Commission Operates	39
(ISA-13) Organization and Content of the NRC Inspection Manual	40
(ISA-14) NRC Interagency Agreements	42
(ISA-15) Interaction with the Public	44
(ISA-16) Contacts with the Media	47
(ISA-17) Institute of Nuclear Power Operations, Nuclear Energy Institute, and National	
Organization of Test, Research and Training Reactors	
(ISA-18) The Freedom of Information Act and the Privacy Act	
(ISA-19) Entrance and Exit Meetings	
(ISA-20) Documenting Inspection Findings	55
(ISA-21) Open, Collaborative Working Environment & Ways to Raise Differing Views	
(ISA-22) Overview of 10 CFR Part 50	
(ISA-22a) Overview of 10 CFR Part 52	
(ISA-23) Overview of 10 CFR Part 19 and 10 CFR Part 20	
(ISA-24) Licensee-Specific Regulatory Documents and Procedures	
(ISA-25) Security Requirements for Nuclear Power Plants	
(ISA-26) Exploring the Operating Reactor Assessment Program	
(ISA-26a) Exploring the Construction Assessment Program	
(ISA-27) Generic Communications	
Basic-Level On-the-Job Activities	
(OJT-1) Facility Familiarization Tour with a Qualified Inspector	
(OJT-2) Control Room Tour with Resident or Other Qualified Inspector	
(OJT-3) On-Site Inspector Emergency Response	
(OJT-4) Licensee Plan-of-the-Day Meeting, Documents, or Information	
(OJT-5) Inspection Activities	
(OJT-6) Documenting Inspection Findings	
Basic-Level Signature Cards and Certification	
Form 1: Basic-Level Equivalency Justification	
Revision History SheetAt	นา-1

#### Introduction

The U.S. Nuclear Regulatory Commission (NRC) inspector training and qualification program requires completion of a variety of activities, each of which is designed to help you learn information or practice a skill that will be important to performing the job of an inspector. When you have completed the entire qualification process, you will have demonstrated each of the competencies that describe a successful inspector. It is recommended that trainees take ADAMS training early in the training process as some training documents are only available in ADAMS.

- 1. A competent inspector must accomplish the following:
  - a. Understand the legal basis for and the regulatory processes used to achieve the NRC's Basic-Level On-the-Job Activities of the NRC organizational structure and objectives (Regulatory Framework).<sup>1</sup>
  - b. Understand the basis for the authority of the agency (Regulatory Framework).
  - c. Understand the processes established to achieve the regulatory objectives (Regulatory Framework).
- 2. Understand the technology and apply concepts in various technical areas to allow the NRC to carry out its overall responsibilities in the following way:
  - a. Understand science and engineering fundamentals in your field of expertise (Fundamental Plant Design and Operation).
  - b. Develop and maintain an understanding of how basic nuclear plant design and operations provide for protection of public health and safety (Fundamental Plant Design and Operation).
  - c. Use knowledge of a specific reactor type or within a specialized technical area to identify, address, and resolve regulatory issues (Technical Area Expertise).
- 3. Master the techniques and skills needed to collect, analyze, and integrate information using a safety focus to develop a supportable regulatory conclusion by doing the following:
  - a. Independently gather information through objective review, observation, and open communications (Inspection).
  - b. Determine the acceptability of information by comparing to established criteria (Inspection).
  - c. Respond to events or conditions involving potential or actual adverse safety consequence (Emergency Response).
  - d. Approach problems objectively, gather and integrate information, and develop a comprehensive understanding before reaching a conclusion (Problem Analysis)
  - e. Objectively analyze and integrate information using a safety focus to identify the appropriate regulatory conclusion and regulatory response (Assessment and Enforcement).

Issue Date: 09/24/21 1 1245 Appendix A

<sup>&</sup>lt;sup>1</sup>Competency areas are listed in parenthesis following each item.

- 4. Develop the personal and interpersonal skills necessary to carry out assigned regulatory activities, either individually or as part of a team, by doing the following:
  - a. Clearly express ideas or thoughts, carefully listen, and speak and write with appropriate safety focus and context (Communication).
  - b. Work collaboratively with others toward common objectives (Teamwork).
  - c. Work independently, exercise judgment, and exhibit flexibility in the completion of activities, including during difficult or challenging situations (Self-Management).
  - d. Use technology to gather, manipulate, and share information (Information Technology).

### Program Organization

The inspector qualification process has two levels. The first level is the Basic Level. Basic-level activities are designed to help you develop an awareness of the role of the agency, your role as an inspector, and the technology you will be inspecting. Accordingly, the individual study and on the job training activities at the basic level are focused by design at the knowledge and understanding level of training, i.e., you will not be routinely assigned training activities that require the application of these newly acquired skill sets. Successfully completing the basic-level work will provide you with a context for meaningful learning during onsite work and a foundation for in-depth learning at the next level. After successfully completing the basic-level activities, you will be eligible to receive a Basic Inspector Certification.

With a Basic Inspector Certification, you may be assigned to perform limited scope inspection activities under an appropriate degree of detailed supervision where you can apply the skills sets that you have recently acquired. The scope of your assigned inspection activities will be controlled by your immediate supervisor. Typically, your supervisor will review your work in detail at specified points during your qualification activities. You can be asked to conduct inspection activities, but will not be expected to independently reach conclusions, describe official agency positions on evolving issues, or act as an official agency spokesperson. The emphasis in the inspector qualification program is to develop competencies so inspectors can evaluate information, analyze data and apply NRC rules and regulations efficiently and effectively. No set time exists for completing each segment of the program, and there is no exact limit on the number of times you practice on-the-job activities. You must practice until you can perform inspector tasks successfully, in accordance with the evaluation criteria. Therefore, the time needed to complete all of the requirements to receive a Basic Inspector Certification will vary based on your previous education, training, and experience. Most employees will require several months to complete the work to be eligible to achieve Basic Inspector Certification.

The second level of the qualification process is the Proficiency Level, which has two parts. One part focuses on General Proficiency activities, which are designed to develop your interpersonal and inspection skills so that you can apply the knowledge you have learned and communicate the results to others. The second part focuses on Technical Proficiency activities, which are designed to not only develop your technical expertise in one of the inspector classifications but also provide you with the tools to evaluate information, analyze data, and apply NRC rules and regulations. The final activity in the Proficiency Level is to appear before a qualification board. Successfully appearing before the qualification board will ensure that you have a sufficiently integrated understanding of the role of the agency, the inspection program, and your role as an inspector to act independently in the field. Upon successful completion of all proficiency-level

Issue Date: 09/24/21 2 1245 Appendix A

activities, including the qualification board, you will be eligible to receive a Full Inspector Qualification. As a fully qualified inspector, you will be assigned the full scope of inspection activities to perform independently.

You will need to complete three qualification journals (Basic Level, General Proficiency Level, and Technical Proficiency Level) during the inspector qualification process. You may work on the General and Technical Proficiency Journals at the same time. Each journal identifies the classroom requirements and provides the individual study activities and on-the-job learning activities you must complete. The signature cards and certifications, which you will use to document your progress as you move through the Basic and Proficiency Levels, can be found at the end of each journal. Each journal also contains a form to document the justification for accepting equivalent training or experience as a means of meeting an inspector qualification requirement. The signature cards, certification pages, and equivalency justification pages will become the permanent record of your completion of the inspector qualification program and will be placed in your official file.

### Required Basic-Level Training Courses

These courses can be taken in any order:

- Site Access Training Self-Study Course (Web-based, course H-100S in the Talent Management System (TMS))
- R-100, Reactor Concepts (Web-based, course in TMS) (for power reactor and construction inspectors only)
- Ethics Training for New Employees (Web-based, course in TMS) as part of ISA-3
- Allegation Process (Web-based, course in TMS) as part of ISA-5
- Information Security (INFOSEC) Awareness (Web-based, course in TMS) as part of ISA-25
- P-105, PRA Basics for Regulatory Applications (instructor-led, course 502 in TMS) (for power reactor and construction inspectors only)
- G-105, Conducting Inspections (instructor-led, course 772 in TMS)
- Industrial Safety courses in TMS (Web-based, course numbers listed in OJT-1)
- Non-Concurrence Process (Web-based, course in TMS) as part of ISA-21
- Differing Professional Opinion (Web-based, course in TMS) as part of ISA-21

G-115, "Practical Applications of Reactor Technology" is not a required course, but teaches the training objectives in OJT-1, 2, and 4 (instructor-led, course in TMS).

Issue Date: 09/24/21 3 1245 Appendix A

#### Interpersonal Skills Training

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

- Effective Communications for NRC Inspectors (instructor-led, course 5557 in TMS)
- Gathering Information for Inspectors through Interviews (instructor-led, course 135 in TMS)

#### **Technical Training**

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

#### Basic-Level Individual Study Activities

The individual study activities are designed to direct and focus your efforts as you begin reviewing documents that will be important to the performance of your job. Each study activity begins with a "Purpose" statement informing you of why the activity is important and how it relates to the job of an inspector. The "Level of Effort" has been noted so that you have an idea of how much effort should be expended in completing the activity. (Of course, the times are estimates. You may need a little more or a little less time.) The "Evaluation Criteria" are listed up front so that you will review them first and better understand what you are expected to achieve as a result of completing the activity. Use the evaluation criteria to help you focus on what is most important. The "Tasks" outline the things you must do to successfully address the evaluation criteria.

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

- ✓ The first three activities should be done first. Becoming familiar with the agency, internal and external Web sites, and your overall role as an inspector is important for successfully completing many of the remaining activities. You should also become familiar with the content of the remaining activities so that you can complete the activities as opportunities arise.
- ✓ Complete all parts of each activity.
- ✓ Your supervisor will act as a resource as you complete each activity. Your supervisor
  may also designate other fully qualified individuals to work with you as you complete the
  various activities. Discuss any questions you may have about the content of anything
  you read with your supervisor or designated resource.

✓ You are responsible for keeping track of what tasks you have completed. Be sure to complete all the tasks in each activity before meeting with your supervisor for evaluation.

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

Commission

PURPOSE: The purpose of this activity is to familiarize you with the regulatory history

of the commercial nuclear industry and the evolution of the regulatory framework under which today's NRC staff functions. During this activity you will review the organization of the agency and its staff and the

relationships between the major offices.

**COMPETENCY** 

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 11 hours

REFERENCES: 1. Title 10 of the Code of Federal Regulations (CFR)

2. NUREG-1350, "Information Digest," (NUREGs are in the Document Collections section of the NRC Library on the public Web page, select the latest edition)

- 3. NUREG/BR-0175, "A Short History of Nuclear Regulation," Revision 2, June 2010
- 4. TMS course: "The NRC: An Agency Overview"

## EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the agency's regulatory history and development of the commercial applications of nuclear energy by successfully doing the following:

- 1. Discuss the purpose of the Atomic Energy Act of 1954, as amended.
- 2. Discuss the major regulatory impacts of the Energy Reorganization Act of 1974, as amended.
- Outline the major offices and briefly describe the functioning of the Commission, the Office of the Inspector General, Office of the Secretary (SECY), the Atomic Safety and Licensing Board, the Advisory Committee on Reactor Safeguards, and Commission staff and program offices such as the offices of Nuclear Reactor Regulation (NRR) and Nuclear Security and Incident Response (NSIR) including the Chief Financial Officer and Executive Director for Operations.

- 4. Describe your region or office's organization and key management positions.
- 5. Discuss the relationship between the NRC and the Department of Energy (DOE).

TASKS:

- Locate and bookmark electronic locations of the above-stated reference material for personal use and future reference. Some documents may be available through the regional public affairs office. You can find electronic copies of the above reference documents on the NRC external Web site in the Electronic Reading Room
- 2. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
- 3. Complete the course in TMS "The NRC: An Agency Overview".
  Note: Two offices discussed in the course: "The Office of New Reactors" and "The Office of Federal and State Materials and Environmental Management Programs," no longer exist as separate stand-alone organizations.
- 4. Review and discuss the evaluation criteria with your supervisor.

DOCUMENTATION:

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

Issue Date: 09/24/21 7 1245 Appendix A

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

PURPOSE: The purpose of this activity is to familiarize you with the NRC's internal and

external Web sites and to acquaint you with the information available. Inspectors must routinely review a variety of documents to support their inspection activities. Most of the documents you will need are available electronically. This individual study activity will familiarize you with the Web locations of documents and information vital to your job. Thus, you will begin to build the knowledge you will need later to successfully perform

your assigned responsibilities.

**COMPETENCY** 

AREA: INFORMATION TECHNOLOGY

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. NRC internal and external Web sites

2. Regional or office Guidance (as applicable)

EVALUATION CRITERIA:

There are no specific evaluation criteria for this activity. Use your supervisor or other agency personnel as a resource as you complete this activity.

NOTE: Circumstances may result in some parts of the Web sites being unavailable at times. Complete as much as possible.

NOTE: There are often several ways to reach a piece of information. As you navigate the various Web sites you will be directed to bookmark specific information that you will need to access later to complete other activities in this manual chapter.

TASKS: Open your Web browser and do the following:

- 1. Explore the NRC's internal home page.
  - a. Explore the applications that are available on this website with a special focus on the Agency Document and Management System (ADAMS).

- b. Locate the Ethics area which is managed by the Office of General Counsel (OGC).
  - i. Review the information that is available for new employees
  - ii. Note the various sources of ethics advice.
- c. Locate the Library Services area (NRC Technical Library) and review the available information.
- d. Locate the Office of Nuclear Reactor Regulation's (NRR) home page. (Hint: NRR is a program office.)
  - i. Identify the Director, NRR.
  - ii. For research and test reactor inspectors, find and review the division organization, and Office Instructions
  - iii. For power reactor inspectors, find the Reactor Oversight Process (ROP) <u>Digital City SharePoint</u> site and bookmark it. You will need the location of Digital City to complete other individual study activities.
- e. Locate the Office of Nuclear Materials Safety and Safeguards' (NMSS) home page and review the function of the office.
- f. Locate the Office of Enforcement's home page and bookmark it. Review the functions of the office.
- g. Locate the SECY home page.
  - i. Review the functions of the office.
  - ii. Review the purpose of a SECY paper.
  - iii. Review the purpose of staff requirements memoranda.
- h. Review the information found on the home page of each of the NRC regional Web sites and the NRC Technical Training Center (if available).
- i. Locate the site for NRC management directives (MDs) in Volume 8, "Licensee Oversight Programs."
  - i. Find the MD dealing with the NRC Incident Investigation Program; review the purpose of the program.
  - ii. Find the MD dealing with the management of allegations; describe the general policy on disclosure of the identity of an alleger.
  - iii. Find the MD that discusses backfitting. Be able to describe what is a backfit or forward fit and provide examples.

Issue Date: 09/24/21 9 1245 Appendix A

- j. Locate the agency's TMS application.
  - i. Locate the schedule and find the next presentation of the Westinghouse Simulator Refresher course (R-704P) or the Health Physics Technology course (H-201).
  - ii. Review how to enroll in a course.
  - iii. Locate the Self-Paced Learning area.
  - iv. Find the Web-based allegation management training.
  - v. Review the list of available Web-based learning opportunities.
  - vi. Review the list of other available self-paced learning opportunities.
- k. Under the NRC Web Applications link, locate the NRC Knowledge Center (NKC).
  - i. Review the Communities of Practice (CoP) available on the NKC.
  - ii. Select a CoP in an area of interest to you. (It may be necessary to become a member of the CoP to view the information if SUNSI material is there.)
    - Review the documents posted in that CoP.
    - Review past questions and answers in the CoP.
    - Review the subscription options available to be notified of updates to the CoPs
- I. Locate the Reactor OpE Information Gateway (NRR Website).
  - i. Determine what information is available and how to conduct specific searches.
  - ii. For search guidance or to subscribe to OpE Communications (COMMs), Technical Review Groups (TRG) or OpE clearinghouse emails, send an email to NRR DRO IOEB.Resource@nrc.gov
  - iii. Determine the purpose of the OpE Smart Sample Program and review several recent examples
- m. Locate the Reactor Program System (RPS) application located on the NRC intranet.
  - i. Review the various dropdown boxes in the application. If you have a reference site/licensee, locate the inspection plan for that assigned facility.
  - ii. Familiarize yourself with the capabilities of the RPS system by skimming the RPS desktop guide located at the following url: https://rrps.nrc.gov/inspections/assets/Help\_Documentation.pdf

Issue Date: 09/24/21 10 1245 Appendix A

- 2. Explore the NRC's external (public) server.
  - Go to the NRC Library.
    - i. Find the Glossary (Basic References).
    - ii. Find the NRC Inspection Manual and bookmark it (Document Collections).
    - iii. Find Regulatory Guides. Read about the purpose of a regulatory guide (RG).
    - iv. Locate Generic Communications documents. Review the purpose of each type of generic communications. Review several recently issued documents of each type.
    - v. Find NUREGs. Read about the different types of NUREG documents and determine how you can tell the difference.
    - vi. Find the NRC Regulations contained in Title 10 of the CFR.
      - How many volumes comprise Title 10? What parts are applicable to the NRC?
      - Use the search feature and search on "radiation protection." View one of the documents to read about what a recent change to the CFR involved.
      - View a part of the CFR. Look for the information that indicates when the regulation was issued and amended.
    - vii. Find and review the general purposes and procedures associated with the Privacy Act and the Freedom of Information Act (FOIA).
  - b. Go to About NRC. Locate and review the rulemaking process under How We Regulate.
  - c. Go to Nuclear Reactors (For power reactor inspectors only).
    - i. Review the information relating to Operating Reactor Oversight and the ROP.
    - Review the information found in the Performance Indicators Summary and Inspection Findings Summary located under Reactor Oversight Process (ROP) > "Performance Summaries." Choose a plant and review that data.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic - Level Certification Signature Card Item ISA-2.

Issue Date: 09/24/21 11 1245 Appendix A

TOPIC: (ISA-3) Inspector Objectivity, Protocol, and Professional Conduct

PURPOSE: The purpose of this activity is to acquaint you with the NRC's expectations

of inspector conduct and protocol. Professionalism is essential to the agency's ability to fulfill its goals of protecting public health and safety. Inspector conduct is a vital component of NRC's credibility as an effective regulator. As a qualified inspector, you will often be representing the agency in interactions with licensee management and workers, local officials, media, and the public. This individual study activity will help you understand NRC procedures, policies, and expectations related to

inspector conduct. This activity will also help you develop the professional

conduct that you will need to be an effective NRC inspector.

COMPETENCY

AREAS: INSPECTION

SELF-MANAGEMENT

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. NRC Inspection Manual Chapter (IMC) 0102, "Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities"

2. MD 7.5, "Ethics Counseling and Training"

- 3. IMC 1201, "Conduct of Employees"
- 4. IMC 2515 Section 12.06, "Witnessing Unsafe Situations"
- 5. Regional or office guidance related to inspector/employee conduct
- 6. Appendix C (Plant Response and Event Follow-up) of Inspection Procedure 71153, "Follow-up of Events and Notices of Enforcement Discretion"
- 7. Management Directive 8.17 "Licensee Complaints Against NRC Employees"
- 8. The Ethics page of OGC's Website
- 9. IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document," Appendix A, "Construction Inspection Program Guidance" (construction inspectors only)
- 10. Ethics Training for New Employees (Web-based, course in TMS).

## EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of proper NRC inspector conduct during inspections at nuclear facilities by successfully completing the following:

- 1. What are the expectations of NRC employees regarding the following?
  - a. Alcohol, illegal drugs, and cannabinoid use?
  - b. official business and personal relationships?
  - c. business partnerships with licensees?
  - d. work habits and professional demeanor?
- 2. Describe the restrictions regarding the following specific employee activities which could result in a loss of impartiality (or the perception thereof):
  - a. accepting transportation from licensee personnel
  - b. attending social functions that are not open to the general public and are essentially limited to licensee and licensee contractor personnel
  - c. use of licensee fitness facilities
  - d. coffee clubs, cafeterias, credit unions
  - e. property and neighborhood relationships
  - f. community activities
  - g. employment of spouse and children
  - h. conversing with licensee personnel on social media
- 3. Explain the Office of Government Ethics standards of ethical conduct for the following areas as applicable to NRC inspectors:
  - a. gifts from outside sources
  - b. aifts between employees
  - c. conflicting financial interests
  - d. impartiality in performing official duties
  - e. seeking employment at NRC regulated facilities
  - f. misuse of regulatory authority
  - g. political activities at work
  - h. employee responsibilities regarding the workplace environment
- 4. What are the actions expected to be performed by NRC personnel when they identify unsafe work practices or violations which could lead to an unsafe situation at an NRC licensed facility?
- 5. What are some of the techniques used by NRC managers to verify the performance and objectivity of individual inspectors and team leaders during onsite activities at reactor facilities? Your answer should include discussion of the specific areas that NRC management should focus on in assessing inspectors.

Issue Date: 09/24/21 13 1245 Appendix A

- 6. What are the expectations of inspector conduct in a reactor control room during normal, transient, and emergency conditions?
- 7. What are NRC employees supposed to do if they receive an allegation of improper action by an NRC staff member or contractor involved in inspection or other oversight activities?

TASKS:

- Explore the information available on the Ethics page of OGC's
  Website particularly the information on the Ethics Advice and
  Articles tab. Find and read the Summary of Major Ethics Rules for
  NRC Employees (Ethics Articles) and the Ethics Orientation for New
  Employees Complete the Ethics Training for New Employees in
  TMS.
- 2. Locate and review the material specifically listed in the reference section of this activity. Although the agency has a code of ethics for employee/inspector conduct, not all regions or offices have specific guidance in this area. You should closely review the guidance applicable to your position. Some of this guidance may be located in directives which describe the duties and responsibilities of specific positions (e.g., resident staff or project engineer guidance).
- Meet with your regional counsel or other designated ethics expert and discuss applications of ethics to your role as an NRC employee. Demonstrate your understanding of the guidance by explaining the answers to the first three questions listed in the evaluation criteria section of this activity.
- 4. Meet with your supervisor, your regional counsel, or other designated ethics expert to discuss any questions you may have as a result of this activity. Discuss the items listed under the evaluation criteria section of this study activity with your supervisor.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-3.

Issue Date: 09/24/21 14 1245 Appendix A

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

PURPOSE: The purpose of this activity is to provide you with an understanding of the

Fitness-for-Duty Rule (FFD). Nuclear power plants and certain other NRC licensees are required to have FFD programs which include drug and alcohol testing procedures and other measures to assure that the licensee

staff can operate the facilities safely.

Note: Research and test reactors are not subject to 10 CFR Part 26, "Fitness for Duty Programs," but according to 10 CFR 55.53(j) each licensed operator is required to meet FFD performance standards and according to 10 CFR 55.53(k), each licensed operator "...shall participate in any drug and alcohol testing program that may be established for that non-power facility."

COMPETENCY AREAS:

INSPECTION

**SELF-MANAGEMENT** 

LEVEL OF EFFORT:

3 hours

REFERENCES:

- Enforcement Manual, Part II, Section 2.4, "Enforcement Actions Involving Fitness-For-Duty (FFD)" (research and test reactors [non-power reactors] are subject to this enforcement guidance only if there has been a program for drug and alcohol testing established for that non-power reactor.)
- 2. 10 CFR Part 26, "Fitness for Duty Programs"
- 3. SECY 00-0022, "Rulemaking Plan, "Decrease in the Scope of Random Fitness-for-Duty Testing Requirements for Nuclear Power Reactor Licensees," for Amendments to 10 CFR Part 26"
- 4. NUREG-1912, "Summary and Analysis of Public Comments Received on Proposed Revisions to 10 CFR Part 26 Fitness for Duty Programs" Section 4.2, "Performance Objectives" and Section 4.4.3, "Procedures"

## EVALUATION CRITERIA:

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

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

- 2. Explain why the FFD rule (10 CFR Part 26) is not considered an "unwarranted" invasion of privacy and how licensees implement the requirements.
- 3. Discuss the enforcement policy related to violations of the FFD rule.
- 4. Answer the following questions related to FFD. To whom does the FFD rule apply? Can a licensee deny access to an NRC inspector that they suspect has been drinking? If not, what can the licensee do about it? What are the reporting requirements associated with FFD violations committed by licensed operators, supervisory personnel, and maintenance technicians?
- 5. Discuss the basis for the .04 Blood Alcohol Content limit. Why was this limit chosen? Can this limit be exceeded if an individual abstains from alcohol use four hours prior to reporting to work?
- 6. What are the FFD requirements for sites that are under construction or are suppliers of basic components that will be used at a reactor plant site?

TASKS:

- 1. On the NRC's external Web site, use the search function to find information on "fitness for duty."
- 2. Read the information on the history of the NRC's Fitness for Duty Program.
- 3. Explore all aspects of the FFD rule and drug testing program guidance provided on the NRC Web site.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-4.

Issue Date: 09/24/21 16 1245 Appendix A

TOPIC: (ISA-5) Allegations

PURPOSE: The purpose of this activity is to familiarize you with the procedures,

guidance, and activities applicable to handling the receipt, processing, review, and closure of allegations. This study activity will help you to effectively interact with individuals who bring concerns to the NRC and to

appropriately respond to those concerns.

**COMPETENCY** 

AREAS: INSPECTION

SELF-MANAGEMENT COMMUNICATION

LEVEL OF

EFFORT: 12 hours

REFERENCES: 1. MD 8.8, "Management of Allegations"

- 2. Allegation Manual
- NRC Form 613, "Allegation Program Identity Protection Policy" available in the Forms Library at: https://usnrc.sharepoint.com/teams/NRC-Forms-Library/SitePages/Home.aspx
- 4. Allegation Manual, Exhibit 1, "Information to be Obtained/Provided During the Initial Contact with the Alleger" or equivalent allegation receipt guidance
- 5. 10 CFR Part 50.5, "Deliberate Misconduct" (for 10 CFR Part 52 licensees: 10 CFR Part 52.4)
- 6. 10 CFR Part 50.7, "Employee Protection" (for 10 CFR Part 52 licensees: 10 CFR Part 52.5)
- 7. 10 CFR Part 50.9, "Completeness and Accuracy of Information" (for 10 CFR Part 52 licensees: 10 CFR Part 52.6)
- 8. Regional or office guidance on allegations
- 9. NUREG/BR-0240, "Reporting Safety Concerns to the NRC"
- 10. Office of Enforcement Webpage

EVALUATION CRITERIA:

1. Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's allegation process by successfully completing the following:

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

TASKS:

- 1. Review the applicable regulations and guidance listed in the reference section.
- 2. Complete the Web-based training modules on the allegation process that are located in TMS. There are at least two courses that must be completed. These courses are titled: "Allegations Process" and "Allegations Intake and Routing." Individuals who are assigned to a Regional office, may also have to take focused allegation training that was developed based, in part, upon lessons-learned. If you are assigned to a Regional office consult your supervisor for details regarding the need to complete such training.
- 3. Review the applicable regional or office guidance for allegations.
- 4. Meet with the OAC and have the individual brief you on the allegation process and the OAC's role in the process.
- 5. Review two closed allegation case files (if possible, one should include an inspection effort) to:
  - Identify how incoming correspondence or information was determined to meet the definition of an allegation and how specific concerns were identified.

Issue Date: 09/24/21 18 1245 Appendix A

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

DOCUMENTATION:

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

Issue Date: 09/24/21 19 1245 Appendix A

TOPIC: (ISA-6) NRC's Response to an Incident at a Nuclear Facility

PURPOSE: The purpose of this activity is to acquaint you with the actions taken by the

NRC in response to an incident that may occur at a nuclear

facility. Incident Response (IR) is vital to the agency, fulfilling one of its primary mandates of protecting the health and safety of the public. As a

fully qualified inspector, you will be trained to perform specific IR

activities. This individual study activity will help you understand how the NRC meets its IR mandate and begin to build the knowledge you will need

later to successfully perform your assigned emergency response

responsibilities.

COMPETENCY

AREA: INCIDENT RESPONSE

LEVEL OF

EFFORT: 12 hours

REFERENCES:

- 1. NRC internal Web page (Offices>Nuclear Security and Incident Response (NSIR))
- 2. MD 8.2, "NRC Incident Response Program"
- 3. Incident Response Manual Chapter 200, "Incident Response Plan"
- 4. Region specific policy/guidance for Incident Response
- 5. IP 71153 Attachment 2, "Limiting NRC Impact During Events"
- 6. General Response Training (Web Based) Course located in TMS
- 7. NRC NIMS/ICS Training (Web Based) Course located in TMS

## EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the role of the agency and your region or office in protecting public health and safety when responding to incident at a nuclear facility by successfully completing the following:

 Identify the types of emergency classifications and give examples of when the different classifications would be declared.

- Describe the differences in capabilities and functions between the NRC Incident Response Program when it is activated and when it is not. Describe the process by which the NRC activates the response program.
- 3. Discuss the capabilities (e.g., communications, information technology) provided in the Headquarters, Regional, and onsite and offsite emergency response facilities.
- 4. Identify the responsibilities of the following during an activation of the NRC's IR Program:
  - a. Response Director
  - b. Senior Agency Representative to the -Licensee/Unified Coordination Group
  - c. Public Information Team
  - d. Liaison Team
  - e. Operations Section Chief
  - f. Reactor Safety Group
  - g. Protective Measures Group
  - h. Security Group
  - i. Planning Section
  - j. Logistics Section
  - k. Headquarters Operations Officers
- 5. If you are onsite when an emergency is declared, explain the difference in your actions if the resident inspectors are and if they are not onsite. Describe the protocol for limiting unnecessary impact on licensee activities during an event.
- 6. Describe the roles of the state and licensee emergency response facilities, such as the Technical Support Center (TSC), Alternate TSC, Operations Support Center, Emergency Operations Facility, Joint Information Center, and State Emergency Operations Center. Describe the role of the Main Control Room during emergencies.

TASKS:

- 1. Review your region or office's policy guidance on incident response.
- 2. Review the NRC Incident Response Plan (IRMC 200) in order to address the evaluation criteria.
- 3. Regional inspectors meet the Emergency Response Coordinator, tour the Incident Response Center, and if possible, observe the region's response during an exercise or event.

Issue Date: 09/24/21 21 1245 Appendix A

- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.
- Complete the following courses in TMS: 5.
  - a. General Response Training (Web-Based)b. NRC NIMS/ICS Training (Web-Based)

### DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-6.

TOPIC: (ISA-7) The Enforcement Program

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

enforcement program. This individual study activity will assist you in learning and understanding (1) the purpose of the enforcement program, (2) the sanctions used in the enforcement program, and (3) the methods used in assessing and dispositioning violations. It will also provide you with an understanding of the information and guidance resources available

to the staff on the enforcement program.

COMPETENCY

AREAS: REGULATORY FRAMEWORK

**ENFORCEMENT** 

LEVEL OF

EFFORT: 17 hours

REFERENCES:

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

# EVALUATION CRITERIA:

Upon completion of the tasks in this activity, demonstrate your understanding of the agency's enforcement program by successfully completing the following items:

- 1. State the purpose of the NRC enforcement policy.
- 2. Describe the legal basis from which the NRC derives its enforcement authority.
- 3. Identify the burden of proof standard that the NRC uses in enforcement proceedings.
- 4. Identify the primary sanctions the NRC uses in the enforcement program.
- 5. State the four issues the NRC considers when assessing the significance of a violation.
- 6. Describe the two types of significance categorization outcomes.

- 7. Define a minor violation and state the policy on documenting and correcting these violations.
- 8. Define non-cited violation.
- 9. Define escalated enforcement action.
- 10. Write a draft violation given case-specific facts.
- 11. Understand how to use the enforcement process diagram to disposition violations.
- 12. Describe what predecisional enforcement conferences and regulatory conferences are and why, when, and with whom they are conducted.
- 13. Discuss the purpose of civil penalties, when the NRC considers issuing them, and how the NRC determines the amount of penalties.
- 14. Recognize the purpose of the different types of Orders and when they are used.

TASKS:

- 1. Locate the Enforcement Web page on the NRC public Web site. (Hint: Look under How We Regulate.)
- 2. Read the enforcement program overview included on the Enforcement Web page of the NRC external Web site.
- 3. Read the enforcement process diagram on the Enforcement Web page of the NRC external Web site.
- 4. Locate the enforcement manual on the Enforcement Web page of the NRC external Web site (look under Enforcement Guidance) and review the table of contents and appendices.
- Read the memorandum from the Director, Office of Enforcement, dated December 5, 2000, titled, "Dispositioning of Enforcement Issues in a Risk-Informed Framework" (ADAMS Accession No. ML003777558).
- Locate the most recent escalated enforcement action for a power reactor (construction inspectors use an escalated construction enforcement action if available) on the Enforcement Web page of the NRC external Web site and review the transmittal letter and attached notice of violation.
- 7. Review your region or office's guidance on implementing the enforcement policy.

Issue Date: 09/24/21 24 1245 Appendix A

- 8. Go to TMS and complete the course on "Writing Violations." Follow the guidance in the course to draft violations for the three sets of facts presented in the course.
- 9. Meet with the enforcement specialist in your region or office to review the draft violations you developed as part of the "Writing Violations" course and discuss the current enforcement guidance.
- 10. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-7.

Issue Date: 09/24/21 25 1245 Appendix A

TOPIC: (ISA-8) The Office of Investigations

PURPOSE: The purpose of this activity is to familiarize you with the Office of

Investigations (OI). As a fully qualified inspector you may be assigned to work with OI by providing technical support. This individual study activity will help you understand the role of OI, how it functions, and what your responsibilities will be if you are assigned to assist OI during the conduct

of an investigation.

COMPETENCY

AREAS: INSPECTION

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES: 1. MD 9.8, "Organization and Functions, Office of Investigations"

2. NRC external OI Web site

3. NRC internal OI Web site

4. <a href="https://www.nytimes.com/1997/03/15/us/nuclear-official-guilty-in-maine-yankee-case.html">https://www.nytimes.com/1997/03/15/us/nuclear-official-guilty-in-maine-yankee-case.html</a>

# EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the purpose and function of OI by successfully completing the following:

- 1. State the function of OI.
- 2. Describe the organizational structure of the OI.
- 3. Describe what your role would be in assisting OI while they are conducting an investigation, and the importance of not discussing the facts/issues of the case to individuals that do not have "a need to know."
- 4. Describe the authorities of an OI investigator.

TASKS: 1. Review the references.

- 2. Review the OI Web page and associated organizational charts. Focus on the section that provides an overview of the office.
- 3. Meet with an experienced OI criminal investigator and discuss two materials/reactors cases investigated by OI, one substantiated and one not substantiated.

Issue Date: 09/24/21 26 1245 Appendix A

Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation 4. criteria section.

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

1245 Appendix A Issue Date: 09/24/21 27

TOPIC: (ISA-9) Exploring the Operating Reactor Inspection Program and the

Reactor Oversight Program's Internal Web Page

PURPOSE: The purpose of this study activity is for you to obtain a broad overall

knowledge of the operating reactor inspection program and to an available resource you might find useful as an inspector. Upon completion of this study activity, you will have the necessary background to go into a more detailed study of the inspection program, and learn the specifics of what an

inspector does, why it is done, and how it is done.

COMPETENCY

AREAS: INFORMATION TECHNOLOGY

INSPECTION COMMUNICATION

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 34 hours

REFERENCES: For power reactor inspectors only:

- 1. NUREG-1649, "Reactor Oversight Process"
- NRC Inspection Manual Chapter (IMC) 2515, "Light Water Reactor Inspection Program - Operating Phase"
- 3. IMC 0611, "Power Reactor Inspection Reports"
- 4. IMC 0612, "Issue Screening"
- 5. IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"
- 6. IMC 0305, "Operating Reactor Assessment Program"
- 7. Reactor Oversight Program Internal Web page

For research and test reactor inspectors only:

- 1. IMC 2545, "Research and Test Reactor Inspection Program"
- 2. IMC 0615, "Research and Test Reactor Inspection Reports"

For power reactor inspectors and research and test reactor inspectors:

1. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"

- 2. IMC 0620, "Inspection Documents and Records"
- 3. NUREG/BR-0326, "NRC Inspector Field Observation Best Practices" (on the ROP <u>Digital City SharePoint</u> site)

## EVALUATION CRITERIA:

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

- 1. State when the NRC starts implementing the operating inspection program at a site and how long it remains in effect.
- 2. State the seven safety cornerstones and their purpose. (For power reactor inspectors only.)
- 3. Define the relationship of cornerstones to strategic areas. (For power reactor inspectors only.)
- 4. State the three major program elements of the Operating Reactor Inspection Program and their specific functions. Identify how often resources are assigned to each program element. (For power reactor inspectors only.)
- 5. Compare and contrast a "smart" sample and a random sample. Explain why the "smart" sample is more appropriate for the ROP. (For power reactor inspectors only.)
- 6. State the criteria for declaring that an inspection is complete.
- 7. State the purpose of providing an inspection-hours estimate in each procedure.
- 8. State the purpose and content of inspection reports.
- 9. State the general policy regarding an inspector's review and handling of non-NRC generated documents.
- 10. State the policy for announced and unannounced inspections and for controlling major inspection activities at a licensee's site.
- 11. Describe the characteristics of a "major" inspection activity and state the limitations as to how many can be performed during a specified time limit. (For power reactor inspectors only.)
- 12. Describe in general terms the implementation of the NRC operating reactor assessment program. (For power reactor inspectors only.)

Issue Date: 09/24/21 29 1245 Appendix A

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

TASKS:

- 1. Locate the applicable inspection guidance, either IMC 2515, "Light-Water Reactor Inspection Program-Operations Phase," and its appendices A, B, C, and D or IMC 2545, "Research and Test Reactor Inspection Program." Read the appropriate IMC in detail and scan the appendices to become aware of the organization of the operating inspection program, including its major parts.
- Locate NUREG-1649, "Reactor Oversight Process." (For power reactor inspectors only.) Read the NUREG to become aware of the concept of the Reactor Oversight Program, its parts, and how it is implemented through IMC 2515.
- 3. Locate IMCs 0611, "Power Reactor Inspection Reports" and IMC 0612 "Issue Screening" (for power reactor inspectors only) or IMC 0615, "Research and Test Reactor Inspection Reports" (for research and test reactor inspector only). Read the appropriate manual chapter to obtain a general understanding of the objectives of an inspection report, become familiar with the terminology, definitions, and format of an inspection report, and have a general understanding of how inspection findings are addressed.
- 4. Locate IMC 0330, "Guidance for NRC Review of Licensee Draft Documents," and IMC 0620, "Inspection Documents and Records." Scan the two manual chapters to obtain a general knowledge of the types of documents that will be encountered during an inspection and the NRC policy regarding how these documents should be handled.
- 5. Locate IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites." (For power reactor inspectors only.) Scan the manual chapter to obtain a general understanding.
- Locate IMC 0305, "Operating Reactor Assessment Program." (For power reactor inspectors only.) Scan the manual chapter to obtain a broad understanding of how the NRC assesses licensee performance and the actions the NRC takes for varying levels of licensee performance.
- 7. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the evaluation criteria section.

Issue Date: 09/24/21 30 1245 Appendix A

- 8. Open your Web browser. Locate the ROP Web page on the NRC internal Web site. The reactor oversight process is a program that is supported by NRR.
- 9. Find the ROP blank feedback form (ROP <u>Digital City SharePoint</u> site). Internal stakeholders use this form to send comments to NRR (the program office) about the ROP process and procedures (via their branch chief). Talk with an experienced inspector about the process of submitting a feedback form. If the opportunity is available, work with an experienced inspector as he/she completes a feedback form.
- 10. Locate the Program Points of Contact section. Review the list of staff from the Division of Reactor Oversight (DRO) in NRR and their specific Reactor Oversight Program areas of responsibility.

DOCUMENTATION:

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

Issue Date: 09/24/21 31 1245 Appendix A

TOPIC: (ISA-9a) Exploring the Reactor Construction Inspection Program and the

Construction Reactor Oversight Program (cROP) Internal Web Page

(construction inspectors only)

PURPOSE: The purpose of this study activity is for you to obtain a broad overall

knowledge of the construction inspection program for new reactors. Upon completion of this study activity, you will have the necessary background to go into a more detailed study of the construction inspection program, and learn the specifics of what an inspector does, why it is done, and how it is done. You will also obtain a broad overall knowledge of the guidance provided to inspectors (1) for verifying that ITAAC-related activities are performed successfully and (2) to support the Commission's finding, in accordance with 10 CFR 52.103(g), that the acceptance criteria in the

combined license have been met.

COMPETENCY AREAS:

INSPECTION

REGULATORY FRAMEWORK

LEVEL OF EFFORT:

40 hours

REFERENCES:

- 1. 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants"
- 2. NUREG/BR-0298, "Nuclear Power Plant Licensing Process," Rev. 2
- 3. IMC 2501, "Construction Inspection Program: Early Site Permit (ESP)"
- 4. IMC 2502, "Construction Inspection Program: Pre-Combined License (Pre-COL) Phase"
- 5. IMC 2503, "Construction Inspection Program: Inspection of Inspections, Test, Analyses, and Acceptance Criteria (ITAAC)"
- 6. IMC 2504, "Construction Inspection Program Inspection of Construction and Operational Programs"
- 7. IMC 2505, "Periodic Assessment of Construction Inspection Program Results"
- 8. IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document"
- 9. IMC 2507, "Construction Inspection Program: Vendor Inspections"

- 10. IMC 2508, "Construction Inspection Program: Design Verification"
- 11. IMC 0613, "Power Reactor Construction Inspection Reports"
- 12. Construction Reactor Oversight Program (cROP) internal web page
- 13. IP 65001, "Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Matrix Inspections"

# EVALUATION CRITERIA:

After completing this study activity, you will demonstrate your understanding of the reactor construction inspection program by successfully doing the following:

- 1. Explain when the NRC starts implementing the construction inspection program at a site and how long it remains in effect.
- 2. Discuss the framework of the cROP assessment process including construction cornerstones, types of inspection inputs, and the construction action matrix.
- 3. Identify the major program elements of the reactor construction inspection program as outlined in the program Manual Chapters and inspection procedures and discuss their specific functions (specifically IMC 2506 and IP 65001).
- 4. Compare the requirements of the CFR to the inspection objectives of the construction inspection program by discussing the various steps in the licensing process and the objectives of IMCs 2501, 2502, 2503, 2504, and 2508.
- 5. Explain ITAAC and what process is used to verify ITAAC completion in accordance with 10 CFR 52.99.
- 6. Define the relationship between ITAAC and non-ITAAC inspection items.
- 7. Describe the purpose of the NRC periodic assessments of the Reactor Construction Inspection Program.
- 8. State the purpose and content of inspection reports, including how ITAAC-related issues are documented.
- 9. Describe the purpose of the Design Control Document and how it is related to successfully verifying ITAAC completion.
- 10. Explain how verification that ITAAC-related activities have been completed successfully is critical to issuance of the 10 CFR 52.103(g) finding.

Issue Date: 09/24/21 33 1245 Appendix A

11. Discuss how the vendor inspection program supports the new reactor construction inspection program.

TASKS:

- 1. Read 10 CFR 52 to gain an understanding of ITAAC and their role in the licensing process. Locate Inspection Manual Chapters (IMC) 2501, 2502, 2503, 2504, 2507, and 2508; and Inspection Procedure (IP) 65001. Read the documents and scan the appendices to become aware of the organization of the construction inspection program including its major parts.
- Locate NUREG/BR-0298, "Nuclear Power Plant Licensing Process," Rev. 2. Read the NUREG to become aware of the concept of the reactor licensing process, its parts, and how it is implemented through the IMCs.
- Locate IMC 2505, "Periodic Assessment of Construction Inspection Program Results." Scan the manual chapter to obtain a broad understanding of how the NRC assesses licensee performance and the actions the NRC takes for varying levels of licensee performance.
- 4. Locate IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document." Read the document to obtain a general understanding of the cROP.
- 5. Locate IMC 0613, "Power Reactor Construction Inspection Reports" and read the manual chapter to obtain a general understanding of the objectives of a construction inspection report, become familiar with the terminology and definitions, the format of an inspection report, and have a general understanding of how inspection findings are addressed.
- 6. Locate a design control document (e.g. AP1000) and review the contents to obtain a general understanding of how to use the document and how it supports ITAAC inspections.
- 7. Review 10 CFR Parts 52.79, 52.99, and 52.103. Compare the inspections described in IMC 2504 to the topical areas described in 10 CFR 52.79. Pay attention to 10 CFR 52.99(e)(1) and 10 CFR 52.103(g).
- 8. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION:

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

Issue Date: 09/24/21 34 1245 Appendix A

TOPIC: (ISA-10) Performance Indicator Program

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

COMPETENCY

AREAS: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES: 1. IMC 0608, "Performance Indicator Program"

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

# EVALUATION CRITERIA:

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

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

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

TASKS:

- 1. Read IMC 0608, "Performance Indicator Program."
- 2. Read IMC 0308, Attachment 1, "Technical Basis for Performance Indicators."
- 3. Review the NRC performance indicators web page.
- 4. Review IPs 71151 and 71150.
- 5. Scan the introduction of NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines."
- 6. Attend or listen to the FAQ portion of a public monthly ROP meeting to observe the FAQ process.
- 7. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-10.

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

Incident Inspection Team Activities

PURPOSE: The purpose of this activity is to familiarize you with the actions taken by

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

and how this program differs from the NRC Incident Response Program.

COMPETENCY

AREA: INSPECTION

LEVEL OF

EFFORT: 6 hours

REFERENCES: 1. MD 8.3, "NRC Incident Investigation Program"

2. IP 71153, "Follow-up of Events and Notices of Enforcement Discretion"

- 3. IP 93800, "Augmented Inspection Team"
- 4. IP 93812, "Special Inspection"
- 5. IMC 0309, "Reactive Inspection Decision Basis for Reactors"
- 6. IMC 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs" (construction inspectors only)

## EVALUATION CRITERIA:

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

- 1. State the purpose of the NRC Incident Investigation Program.
- 2. Describe an AIT and its purpose.
- 3. Describe a SIT and its purpose.

- 4. Describe an IIT and its purpose. Describe how the Incident Investigation Program is different from the Incident Response Program.
- 5. Describe how the Construction Inspection Program differs from the Operating Reactor Inspection Program with regards to reactive inspections. (construction inspectors only)

- 1. Review MD 8.3, which you can find on the NRC internal Web site.
- 2. Explore all aspects of the Incident Investigation Program presented on the NRC internal Web site.
- 3. Review IMC 2504, Appendix C, "Response to Non-Performance Related Issues/Events." (construction inspectors only)
- 4. Review your region or office's guidance on AIT, SIT, and IIT activities.
- 5. Meet with your supervisor or the person designated to be your resource for this activity to discuss the answers to the questions listed under the evaluation criteria.

DOCUMENTATION:

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

Issue Date: 09/24/21 38 1245 Appendix A

TOPIC: (ISA-12) Understanding How the Commission Operates

PURPOSE: The NRC Commissioners establish the approach NRC staff will use to

address an issue of agency importance. Examples include the

Commission policy statement regarding NRC staff use of probabilistic risk analysis in the decision-making process and resident inspector staffing requirements at power reactor facilities. Commission decisions can have a significant impact on the conduct of inspection activities and inspectors should be familiar with the direction-setting and policymaking activities of

the Commission.

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES: NRC external Web sites

EVALUATION CRITERIA:

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

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

TASKS:

- 1. Read about the Commission's direction-setting and policymaking activities under Policymaking.
- 2. Read about the different kinds of decision documents issued by the Commission.
- 3. Find and read Chairman Meserve's speech given on December 11, 2001, about NRC programs and processes for safety oversight.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

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

PURPOSE: The purpose of this activity is to introduce you to the content and

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

COMPETENCY

AREAS: REGULATORY FRAMEWORK

INSPECTION

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. NRC internal home page (Program Office-NRR)

- 2. IMC 0040, "Preparing, Revising and Issuing Documents for the NRC Inspection Manual"
- 3. TG 9900, "Technical Guidance"

# EVALUATION CRITERIA:

After completing this activity you will demonstrate your understanding of the content and organization of the NRC Inspection Manual, as well as the limitations associated with applying the guidance contained in the manual by successfully doing the following:

- 1. Identify the major parts of the NRC Inspection Manual.
- 2. State the purpose of each of the following types of documents located in the NRC Inspection Manual:
  - a. manual chapters
  - b. inspection procedures
  - c. temporary instructions
  - d. TG 9900 technical guidance
    - i. technical guidance
    - ii. 10 CFR guidance
  - e. change notices

- 3. Describe the numbering/identification process used for the items in No. 2 above.
- 4. Demonstrate the ability to locate copies of inspection documents contained in the NRC Inspection Manual on the NRC Web site.

- 1. Locate IMC 0040 from the Electronic Reading Room on the NRC external Web site.
- 2. Read in detail the section of IMC 0040 titled "Responsibilities and Authorities" and scan the remainder portions of the document.
- 3. Locate the table of contents for the "NRC Inspection Manual."
- 4. Scan the table of contents, noticing the following:
  - a. the date of issuance and latest change notice entered in the table of contents
  - b. title associated with CFR Part numbers
  - c. the number associated with each document
  - d. the issue date and change notice number associated with each document
- 5. Locate the section of the NRC Inspection Manual titled, "Technical Guidance."
- 6. Scan the titles of the individual guidance documents.
- 7. Read the inspection procedures that apply to your inspection area.
- Meet with your supervisor or an experienced inspector to discuss two reactor facility issues that could involve use of the technical guidance contained in TG 9900. Discuss the limitations that are associated with applying the guidance contained in inspection procedures.
- 9. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-13

Issue Date: 09/24/21 41 1245 Appendix A

TOPIC: (ISA-14) NRC Interagency Agreements

PURPOSE: While conducting reactor inspection activities, inspectors may identify

important issues that could adversely affect health and safety but are not under the direct regulatory authority of the NRC. Examples include industrial safety items, such as loose asbestos insulation, defective radioactive waste shipping trailers, or concerns regarding the public evacuation plan for areas that surround NRC licensed facilities. Conversely, other Federal and State agencies may identify issues of concern to the NRC. To ensure that these items are addressed by the proper regulatory authority, the NRC has established agreements, called memoranda of understanding (MOUs), with other Federal and State agencies which outline how these issues should be addressed.

This activity will introduce you to the major interagency agreements that the NRC has entered and familiarize you with the regional or office points of contact that have been established for other Federal and State agencies.

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES:

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

## EVALUATION CRITERIA:

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

- 1. Locate the active MOUs used to coordinate between the NRC and other Federal or State agencies.
- 2. Explain, in general terms, how the NRC coordinates with State and other Federal agencies on matters that are not under the regulatory authority of the NRC.
- Explain the actions required by an NRC inspector when he/she
  identifies an occupational health and safety issue at a reactor
  facility. Be able to state where the guidance for these actions is
  provided.

- 4. Explain how an inspector interacts with state and federal agencies, and with state inspectors who request to observe or participate in an NRC inspection.
- 5. Identify who, in your region or office, is the point of contact for coordinating NRC activities with the following Federal agencies:
  - a. Occupational Safety and Health Administration (OSHA)
  - b. Department of Transportation (DOT)
  - c. Federal Emergency Management Administration (FEMA)
  - d. Department of Energy (DOE)
  - e. State agencies

- Identify where the current NRC MOUs are available in your region or office. You can find electronic versions of Memoranda of Understanding in the NRC Library <a href="https://www.nrc.gov/reading-rm/doc-collections/memo-understanding/">https://www.nrc.gov/reading-rm/doc-collections/memo-understanding/</a>.
- Review the MOUs to develop a general understanding of the agreements between the NRC and OSHA, DOT, FEMA, and DOE. For regional inspectors, review any MOUs between the NRC and the States in your regions. Determine the major services or resources available to be coordinated with the NRC and these agencies.
- 3. Identify the designated liaison for those agencies and State agencies in your region or office.
- 4. Meet with your supervisor, an experienced inspector, or the above liaison representative to discuss two reactor facility issues that involved interface with other Federal or State agencies. Discuss how the agency addressed the issues in the context of the applicable NRC MOU and office guidance.
- 5. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

Issue Date: 09/24/21 43 1245 Appendix A

(ISA-15) Interaction with the Public TOPIC:

PURPOSE: The purpose of this activity is to acquaint you with the expectations of NRC

inspectors when dealing with members of the public. Responsiveness and openness are essential to the agency's ability to fulfill its goal of enhancing openness. As a qualified inspector, you will have many opportunities to interact with the public. This individual study activity will help you

understand NRC procedures, policies, and available resources related to

interaction with the public.

COMPETENCY

AREAS: COMMUNICATION SELF-MANAGEMENT

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 6 hours

REFERENCES: 1. NUREG/BR-0215, "Public Involvement in the Nuclear Regulatory

Process," Revision 2

2. NUREG/BR-0297, "NRC Public Meetings"

3. MD 3.4, "Release of Information to the Public"

4. MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"

5. MD 8.11, "Review Process for 10 CFR 2.206 Petitions"

6. NRC Communications (NRC internal Web page)

7. Regional or office guidance related to interaction with the public (e.g., conduct of public meetings, response to inquiries from the

public, release of information to the public)

8. NRR Project Managers handbook

**EVALUATION** CRITERIA:

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

- 1. Describe the expectations of NRC employees regarding answering telephone calls, e-mails or text messages that involve inquiries from a member of the public.
- 2. Name some resources available to you to assist you in responding to the following types of public inquiries:

- a. general questions about NRC organization and functions
- b. general questions about a technical topic such as radioactive particles
- c. questions about a licensed facility's performance or an NRC inspection
- d. questions on a specific technical issue of current interest
- 3. Describe what is meant by "Plain Language." Identify where examples and guidance related to plain language can be found.
- 4. Explain what a "2.206 petition" is; describe how it is handled by the NRC.
- 5. Describe how other public inquiries, including "non-allegations," are handled in your office.
- 6. Describe what an NRC employee should do if he/she is requested to speak (on an NRC-related topic) at a meeting, such as the Lions Club, local chapter of the American Nuclear Society or a school.
- 7. Identify what types of NRC meetings are generally open to the public. List some that are not usually open to the public.
- 8. Describe how members of the public can find out about NRC public meetings. Discuss the expectations on timeliness of meeting notices and summaries.
- 9. Describe the restrictions regarding the release of information to the public, including specific types of information that are not to be released.

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

#### TASKS:

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

Issue Date: 09/24/21 45 1245 Appendix A

- 3. Visit the NRC Communications page on the NRC internal Web site. Review the public meeting policy and checklist.
- 4. Locate and review the material specifically listed in the reference section of this activity. The NRR Project Manager's Handbook which is located at the following SharePoint site: https://usnrc.sharepoint.com/teams/NRR-DORL NUREG/BR-0200, "Public Petition Process," may also be beneficial in understanding the processing of 2.206 petitions and "ticketed items."
- 5. Review the steps in the rulemaking process on the NRC external Web site under How We Regulate.
- Identify, locate, and review your region's policy guidance on the staff's receipt and processing of inquiries from the general public.
   Meet with your PAO or supervisor and discuss the expectations of an inspector who receives an inquiry.
- 7. Meet with your supervisor and discuss what types of public interactions you are likely to encounter and ensure that you understand what you are to do. Discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

Issue Date: 09/24/21 46 1245 Appendix A

TOPIC: (ISA-16) Contacts with the Media

PURPOSE: The purpose of this activity is to provide you with an understanding of the

importance of communicating with the public and media in an accurate, clear, and noncomplex manner within the limitations of agency guidance for the release of information to the public. Such communication supports one of the NRC's main objectives of increasing openness. This study activity will provide you information on the implementation of the guidance

on contacts with the public and media.

COMPETENCY AREAS:

COMMUNICATION SELF-MANAGEMENT

LEVEL OF EFFORT:

4 hours

REFERENCES:

- NUREG/BR-0202, "Guidelines for Interviews with the News Media"
- 2. MD 3.4, "Release of Information to the Public"
- 3. NUREG/BR-0224, "Guidelines for Conducting Public Meetings"
- 4. NUREG-1614, Vol 7, "Strategic Plan: Fiscal Years 2018 2022"
- 5. NUREG/BR-0308, "Effective Risk Communication"
- 6. Regional or office instructions establishing the policy and process for receipt of inquiries from the public/media.
- 7. January 5, 2011, Yellow Announcement Regarding the Use of Social Media

# EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the guidance on contacts with the media by successfully completing the following:

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

- 4. Discuss the importance of planning ahead and preparing well for communicating with the media.
- 5. Discuss the importance of controlling your speech, including what words not to use, not speculating, not guessing, not answering the "what if" questions, not giving your opinion or repeating any other person's opinion, and not talking off the record.
- 6. Describe the policy and process for how to communicate to management any inquiries from or unplanned interactions with the news media and other members of the public.

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

TASKS:

- 1. Meet with the regional Public Affairs Officer (PAO) or someone from the Office of Public Affairs at Headquarters to discuss the guidelines for interviews with the news media.
- 2. Explore all aspects of the importance of appropriate, accurate, and clear communications with the public as found on the NRC Web site.
- Review the agency guidance on how to communicate with the public/media, NRC expectations/requirements regarding the use of social media when conducting NRC activities and issues that could occur regarding the sharing of information on social media platforms.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-16.

Issue Date: 09/24/21 48 1245 Appendix A

TOPIC: (ISA-17) Institute of Nuclear Power Operations, Nuclear Energy Institute,

and National Organization of Test, Research and Training Reactors

PURPOSE: The purpose of this activity is to familiarize you with the appropriate

protocols when reviewing documentation generated by the Institute of Nuclear Power Operations (INPO), the Nuclear Energy Institute (NEI), or the National Organization of Test, Research and Training Reactors (TRTR). In addition, this activity will familiarize you with the proper conduct when INPO or TRTR is at a facility. Most of this guidance relates to INPO and NEI. However, you should apply it to TRTR, as appropriate.

COMPETENCY

AREAS: REGULATORY FRAMEWORK

SELF-MANAGEMENT

LEVEL OF

EFFORT: 1 hour

REFERENCES: 1. Memorandum of Agreement between NRC and INPO (ML13129A093)

- 2. IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"
- 3. IMC 0611, "Power Reactor Inspection Reports" (for construction inspectors: IMC 0613, "Documenting 10 CFR Part 52 Construction Inspections)
- 4. OEDO Procedure 0220, "Coordination with the Institute of Nuclear Power Operations (INPO)" (available on the NRC internal Web site at the following site: <a href="https://usnrc.sharepoint.com/sites/oedo-hub/Lists/OEDO%20Procedures/Type%20View.aspx">https://usnrc.sharepoint.com/sites/oedo-hub/Lists/OEDO%20Procedures/Type%20View.aspx</a>)

## EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your general understanding of the appropriate protocols and conduct when reviewing INPO, NEI, or TRTR documentation and when conducting an inspection when INPO or TRTR is at a facility by discussing the following:

- 1. Specify when it is appropriate to refer to INPO documents in an NRC inspection report or other agency documentation.
- 2. Identify the circumstances under which you can perform an inspection of an NEI initiative.

- 3. Identify the accepted protocol for an NRC inspector attending an INPO meeting held with licensee personnel.
- 4. Explain the policy for reviewing INPO operating experience (OE) reports during inspection activities.

- 1. Review IMC 0301, "Coordination of NRC Visits to Commercial Reactor Sites"
- 2. Review the section in IMC 0611 on third-party reviews, (for construction inspectors, this guidance is contained in IMC 0613).
- 3. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-17.

TOPIC: (ISA-18) The Freedom of Information Act and the Privacy Act

PURPOSE: The purpose of this activity is to provide you with an understanding of how

the NRC implements FOIA and the Privacy Act while guarding against the inadvertent and unauthorized release of information. While it is very important to communicate with the public, communication must be done within the limitations of agency guidance for the release of information to the public. This supports one of the NRC's main objectives of increasing openness. This study activity will provide you with information on the implementation of the guidance on responding to FOIA requests from the

public.

COMPETENCY AREAS:

COMMUNICATION SELF-MANAGEMENT

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. 10 CFR Part 9, "Public Records"

2. MD 3.1, "Freedom of Information Act"

3. MD 3.2, "Privacy Act"

4. MD 3.4, "Release of Information to the Public"

5. IMC 0620, "Inspection Documents and Records"

- 6. Regional or office instructions establishing the policy and procedure for processing FOIA requests for agency records
- 7. FOIA Training for Federal Employees

## EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the guidance associated with FOIA and the Privacy Act by successfully completing the following:

- 1. Discuss the NRC goal of improving public confidence and how implementing the provisions of FOIA and the Privacy Act will contribute to achieving that goal.
- 2. Identify the completeness and timeliness requirements for responding to a FOIA request and discuss how important this responsiveness is in building public trust.

- 3. Discuss the following responsibilities when responding to a FOIA request:
  - a. provide all records subject to the request in the agency's possession
  - b. identify other NRC offices that might have records subject to the FOIA request
  - c. screen the records before their release to ensure that with holdable information is properly marked before forwarding to Headquarters
  - d. support the decision to withhold information by providing the appropriate exemption and "foreseeable harm" statements
- 4. Identify the type of information that should be withheld from release when responding to a FOIA request, including proprietary, predecisional, and privacy information.
- 5. Describe the legal limitations of what can be released to the public and what must be protected under the Privacy Act.
- 6. Describe the policy and procedure for processing FOIA requests for agency records.
- Discuss the possible consequences associated with maintaining unnecessary electronic or paper copies of licensee documents following completion of an inspection activity.

- 1. Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.
- 2. Explore the information made available to the public on the NRC Web site and within ADAMS.
- 3. Review the agency guidance on how to implement FOIA without releasing predecisional information and other information covered under the Privacy Act.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.
- Complete the on-line course "FOIA Training for Federal Employees" located in TMS.

DOCUMENTATION:

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

Issue Date: 09/24/21 52 1245 Appendix A

TOPIC: (ISA-19) Entrance and Exit Meetings

PURPOSE: Effective communication is critical for overall agency success. For NRC

inspectors, the inspection entrance and exit meetings are the primary

opportunities to communicate issues with licensees. Besides

communicating effectively, inspectors, as Government officials, have additional requirements to follow during entrance and exit meetings to ensure that proprietary data and safeguarded information are not

disclosed, and that information is shared with the public when appropriate.

To ensure that issues are discussed in accordance with NRC

requirements, the agency has established communication standards that outline how entrance and exit meetings are to be conducted. The purpose of this activity is to introduce you to the standards for conducting NRC entrance and exit meetings and to allow you to demonstrate an ability to

conduct an entrance and exit meeting.

COMPETENCY

AREAS: COMMUNICATION

TEAMWORK INSPECTION

LEVEL OF

EFFORT: 6 hours

**REFERENCES**:

- 1. IMC 2515, "Light-Water Reactor Inspection Program-Operations Phase"
- 2. IMC 0620, "Inspection Documents and Records"
- 3. Regional or office guidance (if applicable)
- 4. IMC 2506, "Construction Reactor Oversight Process General Guidance and Basis Document" (for construction inspectors)

## EVALUATION CRITERIA:

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

- 1. Locate the various guidance for conducting NRC entrance and exit meetings.
- 2. Successfully conduct an entrance and exit meeting in accordance with NRC guidance.

- Locate and read the guidance for conducting NRC entrance and exit meetings contained in IMC 2515 and regional or office instructions. (Note: the guidance on entrance and exit meetings contained in IMC 2515 is applicable to construction inspections).
- 2. Observe at least two entrance and exit meetings conducted at a reactor site. If possible, observe meetings that have been conducted for a wide range of inspection activities in a variety of locations, such as a public exit meeting.
- 3. Review an inspection report that was recently completed and conduct a "mock" entrance and exit meeting of the inspection report findings in the presence of your supervisor or a fully qualified inspector designated by your supervisor.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

TOPIC: (ISA-20) Documenting Inspection Findings

PURPOSE: NRC inspection reports serve many important functions. In addition to serving as a vehicle to communicate inspection findings to a licensee,

serving as a vehicle to communicate inspection findings to a licensee, inspection reports form part of the historical record of NRC activities at a

reactor site. To that end, it is vital for inspection reports to clearly document the results of inspection activities conducted. To assist

inspectors in the preparation of inspection reports, the NRC has developed several guidance documents that outline what information should be documented in an inspection report and how that information should be presented. The purpose of this activity is to introduce you to the standards for preparing NRC inspection reports and to allow you to demonstrate an

understanding of the applicable inspection report documentation

requirements.

COMPETENCY AREAS:

INSPECTION

SELF-MANAGEMENT COMMUNICATION

TEAMWORK

ASSESSMENT AND ENFORCEMENT

LEVEL OF

EFFORT: 20 hours

REFERENCES:

- IMC 0611, "Power Reactor Inspection Reports" (for power reactors); IMC 0613, "Documenting 10 CFR Part 52 Construction Inspections" (for 10 CFR Part 52 construction sites); Inspection Manual Chapter 0616, "Fuel Cycle Safety and Safeguards Inspection Reports" (for fuel facilities); or IMC 0615, "Research and Test Reactor Inspection Reports" (for research and test reactors)
- 2. IMC 0612, "Issue Screening," (IMC 0613, Appendix B, "Issue Screening" for construction findings)
- 3. IMC 0620, "Inspection Documents and Records"
- 4. IMC 0306, "Planning, Scheduling, Tracking and Reporting of the Reactor Oversight Process (ROP)"
- 5. CIPIMS Users Manuals Construction Module (for construction inspectors)
- 6. "Plain Language Initiative" Web site, which references NUREG-1379 for editorial style guidance, the directives from the President of the United States, and other related documents (<a href="http://www.internal.nrc.gov/NRC/PLAIN/index.html">http://www.internal.nrc.gov/NRC/PLAIN/index.html</a>)

7. Regional or office guidance (as applicable)

### EVALUATION CRITERIA:

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

- 1. Locate various guidance for preparing NRC inspection reports.
- 2. Verify that an inspection report was written in accordance with the applicable NRC guidance.
- 3. Explain the threshold for documenting licensee and inspector identified issues in NRC inspection reports.
- 4. Define inspection working files and indicate what should be captured in ADAMS, ultimately destroyed, or referenced in the inspection report.
- 5. Describe the documentation process for inspection scope, observations, input for ITAACs, and findings to assure that inspection results will be retrievable for use in the construction closeout and ITAAC verification process. Explain how inspection activities, when properly documented, provide the basis for verifying that the ITAACs have been met. (construction inspectors only)
- 6. Explain how the Construction Inspection Program Information Management System (CIPIMS) is used to plan and document inspections. (construction inspectors only)

TASKS:

- Locate and read the various guidance and applications that are used for planning an NRC inspection and documenting inspection findings. The necessary information will be contained in NRC manual chapters and regional or office instructions.
- Locate and read the various guidance for documenting violations.
   The necessary information will be contained in NRC manual chapters and regional or office instructions.
- 3. Review flow charts in Figure 1 and 2 of IMC 0612, Appendix B (Figure 1 and 2 in IMC 0613, Appendix B for construction findings) and understand when an issue is documented in the following categories: an unresolved item, a violation for which enforcement discretion is exercised, a traditional enforcement violation, a finding with a cross-cutting aspect, and as a licensee-identified non-cited violation in Section 4OA7 of the report.
- Select recently completed inspection reports prepared in your region or office that contain: 1) an NRC-identified finding, 2) an NRC-identified violation, and 3) a licensee-identified violation. Compare the inspection report format and content to the corresponding report preparation guidance in NRC IMC 0611,

Issue Date: 09/24/21 56 1245 Appendix A

IMC 0612, IMC 0613, IMC 0615, or IMC 0616 and to any applicable regional or office guidance. Through review of the guidance, as well as conversations with the report author, verify that the report was prepared in accordance with the requisite report preparation guidance.

- 5. Under the supervision of a fully qualified inspector: navigate the CIPIMS site, including each module and report feature; and locate the CIPIMS test site and input an inspection plan and sample inspection report. (construction inspectors only)
- 6. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the evaluation criteria section.

#### DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-20.

Issue Date: 09/24/21 57 1245 Appendix A

TOPIC: (ISA-21) Environment for Raising Concerns & Ways to Raise Differing

Views

PURPOSE: The purpose of this activity is to communicate the agency's policy on

establishing and maintaining an environment that supports raising concerns and differing views and to provide guidance on the informal and formal processes for pursuing resolution of differing views that are directly related to the NRC's mission. The NRC strives to establish and maintain an environment that encourages all NRC employees and contractors to raise concerns and differing views promptly, without fear of reprisal, through various mechanisms. The free and open exchange of views or ideas conducted in a non-threatening environment provides the ideal forum where concerns and alternative views can be considered and addressed in an efficient and timely manner that improves decision-making and supports the agency's safety and security mission. All NRC employees and contractors are expected to discuss their views and concerns with their immediate supervisors on a regular, ongoing basis. These informal discussions should be enough to resolve most issues. However, if informal discussions do not resolve concerns, employees have various mechanisms for expressing and having their concerns and differing views heard and considered by management, including the

Open- Door Policy, the Non-Concurrence Process (NCP), and the Differing Professional Opinion (DPO) Program. This activity will provide you with an

understanding of these processes.

COMPETENCY AREAS:

INSPECTION

SELF-MANAGEMENT COMMUNICATION

**LEVEL** 

OF EFFORT: 1.5 hours

REFERENCES: 1. NCP web site: https://drupal.nrc.gov/node/24526/

2. DPO Program web site: <a href="https://drupal.nrc.gov/node/24496">https://drupal.nrc.gov/node/24496</a>

3. MD 10.160, "Open Door Policy"

4. MD 10.158, "NRC Non-Concurrence Process"

5. MD 10.159, "The NRC Differing Professional Opinion Program"

6. Regional or office instructions establishing additional implementing guidance for raising differing views (if applicable)

# EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC processes for raising concerns and differing views by successfully completing the following:

- 1. Describe the Open Door Policy.
- 2 Describe the key features of the NCP.
- 3. Describe the key features of the DPO Program.
- 4. Discuss under what circumstances the various methods available for expressing differing views could be used.
- 5. Describe the type of information available on the NCP and DPO Program Web site.

#### TASKS:

- 1. Explore information and guidance for Open Door Policy, NCP, and DPO Program on identified Web sites.
- 2. Review MD 10.160, MD 10.158, and MD 10.159.
- 3. Complete NCP training in TMS.
- 4. Complete DPO training in TMS.

#### DOCUMENTATION:

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

Issue Date: 09/24/21 59 1245 Appendix A

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

PURPOSE: The purpose of this activity is to acquaint you with the regulations that

specify the requirements for all aspects of the construction and operation of a nuclear power reactor. This individual study activity will help you to understand the content of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," and how to locate the specific requirements for any subject. (power reactor and construction inspectors

only)

Regulatory requirements for research and test reactor inspectors are addressed in a similar manner in ISA-RT-2 found in IMC 1245

Appendix C-5.

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. NRC internal home page

2. An electronic or paper copy of the latest revisions to 10 CFR Parts 1 through 50

# EVALUATION CRITERIA:

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

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

TASKS:

1. Become familiar with, and be able to use, the search feature to locate the information available in NRC Regulations and Nuclear

Regulatory Legislation Web pages found on the NRC internal Web site. NRC regulations are in the Technical Library database at the following website: <a href="https://drupal.nrc.gov/tech-lib/catalog/25751">https://drupal.nrc.gov/tech-lib/catalog/25751</a>

2. Power reactor and construction inspectors, read and be familiar with

Issue Date: 09/24/21 60 1245 Appendix A

the following parts of Part 50: 50.2, 50.5, 50.7, 50.9, 50.12, 50.30, 50.34, 50.36, 50.39, 50.48, 50.49, 50.51, 50.54, 50.55a, 50.59, 50.65, 50.67, 50.69, 50.70, 50.71, 50.72, 50.73, 50.109, 50.120, and Appendices A, B, and R.

- 3. Complete the 10 CFR Part 50 quiz to gain an understanding of the key portions of 10 CFR Part 50. This self-study, open-book quiz is in ROP Digital City on the internal NRC Web site under the Communications and Training tab. Since this is an ungraded selfstudy activity, you will also find the answers and associated references on Digital City. Be sure to complete the quiz before you print the answer sheet.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

Note: Several vendors provide searchable mobile applications that contain Title 10 "Energy" of the Code of Federal Regulations. These applications may be a useful source of information to have during the conduct of your NRC inspection activities. If you want to obtain a mobile application for your professional use, discuss with your supervisor/training manager, which application(s) to select and the process for obtaining reimbursement.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-22.

Issue Date: 09/24/21 61 1245 Appendix A

TOPIC: (ISA-22a) Overview of 10 CFR Part 52

PURPOSE: The purpose of this activity is to acquaint you with the regulations that

specify the requirements for all aspects of the licensing and construction of a nuclear reactor using 10 CFR Part 52. This individual study activity will help you to understand the content of 10 CFR Parts 52 and how to locate

specific requirements. (construction inspectors only)

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES: NRC Internal Home Page

10 CFR Parts 52

NUREG/BR-0298, "Nuclear Power Plant Licensing Process," Rev.2

EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of the general content of 10 CFR Parts 50 and 52 by successfully discussing the following:

- 1. State the purpose of Part 52.
- 2. Explain the basis and criteria for the licensing of nuclear plants.
- 3. Recognize and locate specific topics presented in 10 CFR Part 52.
- 4. Discuss the definitions of following terms used in 10 CFR Part 52:
  - a. early site permit
  - b. standard design
  - c. standard design certification
  - d. combined license
- 5. Discuss the importance of the inspections, tests, and analyses discussed in 10 CFR 52.47(b)(1) to the overall licensing of a new nuclear power plant. Explain why there are no inspections associated with standard design certification.
- 6. Explain the differences in the process for licensing plants under 10 CFR Part 50 and 10 CFR Part 52.

- 1. Become familiar with and be able to use the search feature to locate the information available in NRC Regulations & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Web Site to search 10 CFR Part 52.
- 2. Read Part 52 in its entirety with emphasis in the following sections: 52.1, 52.4, 52.5, 52.6, 52.24, 52.25, 52.39, 52.54, 52.71, 52.73, 52.79, 52.91, 52.97, 52.99, 52.103 and 52.104.
- Read NUREG/BR-0298, "Nuclear Power Plant Licensing Process", Rev.2. This document is available on the NRC's external website and may be available in hard copy from each region's Office of Public Affairs. Compare the topics covered in the NUREG to the topics covered in Part 52.
- 4. Locate the subpart in 10 CFR Part 52 where Early Site Permits are discussed. Read all paragraphs related to ESPs including section 52.17 which address the technical information that must be submitted by the applicant and is reviewed by the NRC. Then, review IMC 2501, Construction Inspection Program: Early Site Permits. Compare the inspections conducted under IMC 2501 to the ESP topics being evaluated by the NRC.
- 5. Review 10 CFR Part 52, Subpart B on standard design certification. Pay attention to section 10 CFR 52.47(b)(1), which discusses the inspections, tests, analyses and acceptance criteria of the design.
- 6. Review 10 CFR Part 52, Subpart C on combined licenses. Pay attention to section 10 CFR 52.79. Scan the technical information that must be in the application for a COL.
- 7. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-22a.

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

PURPOSE: The purpose of this activity is to familiarize you with 10 CFR Part 19,

"Notices, Instructions and Reports to Workers: Inspection and

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

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES: NRC internal Web page Information Resources Regs (10 CFR) NRC

Maintained Parts 19 and 20

EVALUATION CRITERIA:

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

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

- 1. Review 10 CFR Part 19 for a general understanding of the following:
  - a. the purpose of 10 CFR Part 19 (19.1)
  - b. requirements for document postings (19.11(d) and (e))
  - c. requirements for promptly identifying any condition that may cause unnecessary exposure (19.12(a)(4))
  - d. Instructions for individuals in a restricted area that may experience unnecessary exposure to radiation and/or radioactive materials (19.12(a)(5))
  - e. the times the NRC can inspect a facility (19.14(a))
  - f. requests by workers for an NRC inspection (19.16(a))
- 2. Review 10 CFR Part 20 for a general understanding of the following:
  - a. the purpose of 10 CFR Part 20 (20.1001)
  - b. occupational dose limits for adults (20.1201)
  - c. occupational dose limits for members of the public (20.1301)
  - d. concepts of ALARA (20.1101)
  - e. conditions requiring individual monitoring of external and internal occupational dose (20.1502)
- 3. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-23.

TOPIC: (ISA-24) Licensee-Specific Regulatory Documents and Procedures

PURPOSE: The purpose of this activity is to acquaint you with several licensee-specific

documents and procedures that you need to be aware of and be able to access on site during an inspection. These documents and procedures describe how a licensee complies with NRC regulations and requirements. As a fully qualified inspector, you will need to identify circumstances for which the licensee is in noncompliance. Inspectors must always also adhere to applicable licensee procedures while on site. This activity will acquaint you with the most common types of licensee-specific regulatory documents and procedures and will help you learn how individual facilities may implement NRC regulations and requirements differently.

COMPETENCY

AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 16 hours

REFERENCES: 1. Improved standard technical specifications or technical specifications for a specific research and test reactor, as applicable

- 2. NUREG-800, "Standard Review Plan," for power reactor and construction inspectors; NUREG-1537, Part 2, "Standard Review Plan and Acceptance Criteria, Guidelines for Preparing and Reviewing Applications of Non-Power Reactors," for research and test reactor inspectors; or NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" for fuel facilities
- 3. NRC RG 1.33, "Quality Assurance Program Requirements (Operations)"
- 4. NRC RG 1.70 or NUREG-1537, Part 1, "Format and Content Guidelines for Preparing and Reviewing Applications of Non-Power Reactors," as applicable
- 5. Updated final safety analysis reports (UFSARs) (any available) or research and test reactor safety analysis reports (SARs), as applicable
- 6. Facility-specific license (any available), or facility specific Combined License (COL) for construction inspectors
- 7. Facility-specific safety evaluation reports (SERs) (any available)

## EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your familiarity with the role of licensee-specific regulatory documents and procedures within the regulatory framework by successfully completing the following:

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

#### TASKS:

- 1. Locate all applicable reference documents.
- Meet with an appropriately qualified inspector and discuss the general objectives of a licensee security plan and any restrictions on public availability. Determine the specific security requirements to which an NRC inspector must personally adhere.
- 3. Discuss with your Office Enforcement Specialist your answers to the above questions related to enforcement policy.

Issue Date: 09/24/21 67 1245 Appendix A

Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the 4. evaluation criteria section.

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-24. DOCUMENTATION:

1245 Appendix A Issue Date: 09/24/21 68

TOPIC:

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

PURPOSE:

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

COMPETENCY

AREA:

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 4 hours

REFERENCES:

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

# EVALUATION CRITERIA:

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

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

- 5. Discuss the Sensitive Unclassified Non-Safeguards Information (SUNSI) program.
- 6. Discuss the responsibilities of escorting individuals inside protected and vital areas.

- 1. Complete all three modules of the Information Security (INFOSEC) Awareness Training that is in TMS.
- 2. Locate and bookmark electronic locations of the above-stated reference material for personal use and future reference. Electronic copies can be found on the NRC external Web site in the Electronic Reading Room.
- 3. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
- 4. Review and discuss the evaluation criteria with your supervisor or a fully qualified inspector.

DOCUMENTATION:

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

### Basic-Level Individual Study Activity

TOPIC: (ISA-26) Exploring the Operating Reactor Assessment Program (for

power reactor and construction inspectors only)

PURPOSE: The purpose of this study activity is for you to obtain a broad overall

knowledge of the operating reactor assessment program. Upon completion of this study activity, you will have the necessary background

to initiate a more detailed study of the operating reactor assessment program in which you will learn about performance assessments, including

inputs, when conducted, and resulting actions.

COMPETENCY

AREAS: ASSESSMENT

REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 24 hours

REFERENCES: 1. NUREG-1649, "Reactor Oversight Process" (for power reactor inspectors only)

2. IMC 0611, "Power Reactor Inspection Reports"

3. IMC 0612, "Issue Screening"

4. IMC 0305, "Operating Reactor Assessment Program"

5. IMC 0308, Attachment 4, "Technical Basis for Assessment"

6. IMC 0310, "Aspects Within the Cross-Cutting Areas"

# EVALUATION CRITERIA:

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

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

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

TASKS:

- 1. Locate NUREG-1649 (for power reactor inspectors only). Read the NUREG to become aware of the concept of the assessment of plant performance and the NRC response.
- Locate IMC 0305. Read IMC 0305 to gain an understanding of how the NRC assesses licensee performance, including security issues, and the actions the NRC takes for varying levels of licensee performance.
- 3. Locate the Plant Assessment and Results link in ROP Digital City (introduced in ISA-2), under the Inspection and ROP Information tab. Discuss the information provided.
- 4. Locate the ROP Action Matrix Summary and the historical ROP Action Matrix Summaries. Discuss the information provided.
- 5. Attend several end-of-cycle review meetings to gain an understanding of the purpose of the meeting, the information discussed, and the decisions made. Whenever possible, attend a meeting that includes a discussion of crosscutting issues, a discussion of plant performance summary (Exhibit 7), and a discussion of safety significant findings and performance indicators. (Construction inspectors can attend a construction site review meeting if available).
- 6. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-26.

Issue Date: 09/24/21 72 1245 Appendix A

### Basic-Level Study Activity

TOPIC: (ISA-26a) Exploring the Construction Assessment Program (for

construction inspectors only)

PURPOSE: The purpose of this study activity is for you to obtain a broad overall

knowledge of the construction assessment program. Upon completion of this study activity, you will have the necessary background to initiate a more detailed study of the inspection program in which you will learn the specifics of what an inspector does, why it is done, and how it is done.

COMPETENCY

AREA: ASSESSMENT and REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 24 hours

REFERENCES: 1. IMC 0613, "Power Reactor Construction Inspection Reports"

2. IMC 2505, "Periodic Assessment of Construction Inspection Program Results"

3. NUREG-2165, "Safety Culture Common Language"

# EVALUATION CRITERIA.

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

- 1. State the purpose of and describe the Construction Assessment Program.
- 2. State the purpose of the action matrix and describe the five different plant performance designations.
- 3. Describe what a substantive crosscutting issue is and the criteria for its initiation.

TASKS:

- Locate IMC 2505. Read IMC 2505 to gain an understanding of how the NRC assesses licensee performance and the actions the NRC takes for varying levels of licensee performance.
- 2. Locate NUREG-2165. Read NUREG-2165 to gain an understanding of safety culture common language.
- 3. Locate IMC 0613, Appendix F. Read IMC 0613, Appendix F to gain an understanding of Construction Cross-Cutting Areas and Aspects.

Issue Date: 09/24/21 73 1245 Appendix A

- 4. Locate the cROP Action Matrix Summary and the historical cROP Action Matrix Summaries. Discuss the information provided.
- 5. Describe what types of information are included in the plant performance summary and describe the performance review process as discussed in Section 2505-10 (Performance Reviews) of IMC 2505.
- 6. Attend an end-of-cycle review meeting to gain an understanding of the purpose of the meeting, the information discussed, and the decisions made. You may either attend construction site review meetings or operating sites review meetings. Whenever possible, attend a meeting that includes a discussion of crosscutting issues, a discussion of plant performance summary, and a discussion of safety significant findings.
- 7. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item ISA-26A.

Issue Date: 09/24/21 74 1245 Appendix A

### Basic-Level Individual Study Activity

TOPIC: (ISA-27) Generic Communications (for power reactor and construction

inspectors only)

PURPOSE: The purpose of this study activity is to become familiar with the different

categories of generic communications, the appropriate uses of each type

and the procedures associated with them.

COMPETENCY

AREAS: REGULATORY FRAMEWORK

LEVEL OF

EFFORT: 8 hours

REFERENCES: 1. Management Directive 8.18, "NRC Generic Communications Program"

2. NRR Office Instruction LIC-400, "Procedures for the Development of New and Revised Generic Requirements for Power Reactor Licensees"

3. Generic communication web page (<a href="http://www.nrc.gov/reading-rm/doc-collections/gen-comm/">http://www.nrc.gov/reading-rm/doc-collections/gen-comm/</a>)

# EVALUATION CRITERIA:

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

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

TASKS:

1. Review the references to understand the principles discussed in the evaluation criteria.

- 2. Identify with the supervisor and review a selection of recent Bulletins, Generic Letters, Information Notices, and Regulatory Issue Summaries. As much as possible, topics should be pertinent to your position.
- 3. If possible, identify with your supervisor and read a selection of licensee's responses and follow-up regulatory actions.
- 4. Meet with the person designated to be a resource for this activity or supervisor and discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

Basic-Level On-the-Job Activities

#### Basic-Level On-the-Job Activities

The on-the-job training (OJT) activities require you to conduct limited scope inspection-related work, under supervision, at a reactor facility. They are designed to allow you to observe and perform key knowledge-based inspector tasks under controlled circumstances. Like the individual study activities, each of the OJT activities informs you why the activity is important, how much time you might need to complete the assignment, and what you are expected to complete successfully during the activity.

Before beginning the activities in this section, you must successfully complete the course work for site access. You can do this in one of two ways. You can complete the NRC Site Access course and the site-specific requirements for access. Or, you may complete the site access requirements at a site. Your supervisor will discuss with you the best way for you to meet the site access requirements.

The following general guidance applies as you complete the various on-the-job activities:

- ✓ The activities in this section should be completed in the order in which they are presented.
- ✓ Complete all parts of each activity.
- ✓ Your supervisor will act as a resource as you complete each activity. Discuss any questions you may have about how a task must be done or how the guidance is to be applied. Your supervisor may also designate other fully qualified inspectors to work with you as you complete the various activities.
- ✓ You are responsible for keeping track of what tasks you have completed. Be sure that
  you have completed all aspects of an OJT activity before you meet with your supervisor
  for evaluation.

Issue Date: 09/24/21 78 1245 Appendix A

# Basic-Level On-the-Job Activity

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

PURPOSE: The purpose of this activity is to (1) acquaint you with the general layout of

a facility and identify various major equipment, (2) instruct you in the types of industrial and radiological personal protection requirements and the proper method of complying with these requirements, (3) instruct you in the use of security procedures, and (4) instruct you in the proper response to an emergency if the emergency is declared while you are in the facility. Note: G-115 "Practical Applications of Reactor Technology (PART)," is an optional course that teaches the training objectives in OJTs-1, 2, and 4.

COMPETENCY

AREAS: INSPECTION COMMUNICATION

FUNDAMENTAL PLANT DESIGN AND OPERATION

EMERGENCY RESPONSE

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

LEVEL OF

EFFORT: 32 hours

REFERENCES: 1. Licensee drawing(s) of the site building layouts

2. IMC 1245 industrial safety courses in TMS

-PPE: Personal Protective Equipment (esh sah a17 sh enus)

-Confined Spaces (esh sah a28 sh enus)

-Scaffolding and Ladder Safety (esh sah a32 sh enus)

-Heat Stress Recognition and Prevention (esh sah a39 sh enus)

-Compressed Gas Safety (esh sah a55 sh enus)

-Safety Data Sheets (esh sah a77 sh enus)

-Electrical Safety (esh\_sah\_b15\_sh\_enus)

-Machine Guarding (esh\_sah\_b16\_sh\_enus)

-Fall Protection (esh\_sah\_b22\_sh\_enus)

-Hearing Conservation (esh\_sah\_b24\_sh\_enus)

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the general plant layout and inspector behavior in the plant by successfully completing the following:

1. Given a drawing of the site building layout, be able to identify where the major facility areas are located such as the control room, turbine building, and technical support center.

- 2. Identify the types of industrial personnel safety equipment that are available and the circumstances under which each piece of equipment should be used.
- 3. Explain how you would know what type(s) of radiological protection equipment are required before entering a radiologically controlled area (RCA).
- 4. Given specific scenarios related to security situations, from loss of a security badge to unauthorized intrusion into the protected area, describe what actions you would take.
- 5. Given specific scenarios related to emergency response situations, including declaration of an emergency event, describe what actions you would take.
- 6. Given specific scenarios related to health physics situations, including a spill of potentially contaminated fluid to a high local radiation alarm, describe what actions you would take.
- 7. Explaining the licensee restrictions regarding the use of personal communication devices at the plant.
- TASKS:
- 1. Review a drawing(s) of the building layout for the site and plan a route for a tour that will include the major areas on the site, such as the following:
  - a. turbine building (for power reactor and construction inspectors) or experimental facilities (for research and test inspectors)
  - b. engineered safeguards equipment areas
  - c. Radiologically Controlled Area (RCA)
  - d. emergency response facility
  - e. control room
  - f. spent fuel pool
  - g. switchyard or electrical distribution system
  - h. diesel generator rooms or other emergency power supplies
  - i. beyond design basis equipment storage areas
  - j. other areas deemed appropriate by a qualified inspector
- 2. Complete the industrial safety courses referenced above. Course numbers will change when courses are updated. Current courses can be assigned to a trainee in TMS by requesting your training coordinator or TrainingSupportResource@nrc.gov to assign the following curriculum, "Health, Safety, and Security Curriculum (MC-1245)." Before the tour, discuss the requirements for personal industrial safety equipment with a qualified inspector.
- 3. Tour the facility with a qualified inspector and locate the major pieces of equipment and facility areas, including but not limited to, those items described above.

Issue Date: 09/24/21 80 1245 Appendix A

- 4. Enter the RCA (if applicable to the site) with a qualified inspector and tour the area to observe and/or discuss items such as different radiological control postings, methods of designating areas that have additional radiological control requirements for entry, different radiological control clothing requirements for different areas, use of portal monitors and personal friskers, and monitoring personal dosimetry.
- 5. During the tour, discuss the proper security procedures for entering the areas discussed above, including the actions to take in the event a procedure error or violation of security rules is committed or observed. Discuss the licensee's guidance regarding the use of personal communication devices on site.
- 6. During the tour, discuss the proper response in the event an emergency is declared while in the facility.
- 7. During the tour, discuss the proper response in the event of a radiological control event or anomaly.
- 8. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

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

Issue Date: 09/24/21 81 1245 Appendix A

#### Basic-Level On-the-Job Activity

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

PURPOSE: The purpose of this activity is to familiarize you with the appropriate

protocol for the conduct of an inspector in a control room. This activity will also help you to become familiar with general control room layout, required control room staffing, and the inspector's role in gathering facility status information. Note: G-115 "Practical Applications of Reactor Technology (PART) is an optional course that teaches the training objectives in

OJTs-1, 2, and 4.

COMPETENCY

AREAS: SELF-MANAGEMENT

INSPECTION

FUNDAMENTAL PLANT DESIGN AND OPERATION

**EMERGENCY RESPONSE** 

LEVEL OF

EFFORT: 3 hours

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

room

EVALUATION CRITERIA:

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

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

TASKS:

- 1. Locate and read appropriate sections of the site-specific guidance for control of operations in the control room.
- 2. Discuss site-specific guidance, as it relates to protocol for conduct of NRC personnel in the control room, with an inspector. Discuss how this guidance could vary from site to site.
- 3. Go to the control room with an inspector and observe appropriate protocol. Gain a general understanding of the control room layout and staffing. Also, observe the inspector gathering facility status information.
- 4. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-2.

# Basic Level On-the-Job Activity

TOPIC: (OJT- 3) On-Site Inspector Emergency Response

PURPOSE: While working at a reactor plant site, a reactor trip, transient, or some other

event may occur that may require a licensee to implement their site emergency plan, contact the NRC or another offsite organization or request offsite assistance from local emergency responders such as fire department or medical personnel. When these events occur, it is important for inspectors to not only ensure their personal safety is maintained, but to also monitor the licensee's response to the event so the NRC can respond appropriately. Although Inspectors who are not fully

qualified are not expected to be able to perform the full range of NRC emergency response functions, they may be the only NRC representative initially available on site during an event. Hence the need for this OJT. Upon completion of this guide, you will be able to locate and deploy the emergency response equipment and procedures located in each resident inspector office, identify the location of the site Technical and Operational Support Centers and understand what actions you are expected to take in

the event the licensee activates their emergency response plan.

COMPETENCY

AREA: INSPECTION

LEVEL OF

EFFORT: 24 hours

REFERENCES: 1. Licensee post-trip response procedure(s)

- 2. Resident Inspector Office Emergency Response Guide
- 3. Licensee's NRC approved emergency action level (EAL) scheme
- 4. Regional or office plant transient check list (as applicable)
- 5. IP 71153, "Follow-up of Events and Notices of Enforcement Discretion"

# EVALUATION CRITERIA:

Complete the tasks specified in this guide and meet with your supervisor to discuss any questions that you may have as a result of this activity. Upon completion of the tasks, you should be able to do the following:

- 1. Given a variety of different scenarios, describe which actions you are expected to take if the licensee implements site emergency response procedures.
- 2. Be able to locate the emergency response equipment and procedures in the NRC resident inspector office and describe how/when you would use the equipment and procedures.

- 3. Describe the location of the site emergency response facilities and be able to travel to them if needed.
- 4. Demonstrate how you would verify that the licensee made the appropriate emergency classification declaration for the event in accordance with its NRC approved EAL scheme.

TASKS:

- Locate the emergency response equipment that is stored in the NRC resident inspector office. Review the office emergency response procedures and protocols.
- 2. Review IP 71153 and the regional or office transient response guidance (if applicable) that defines management expectations for you regarding event follow-up at a reactor site. Discuss these expectations with your supervisor or whoever is directly responsible for your activities at the reactor site.
- 3. Tour the site Technical and Operational Support Centers with an NRC individual who is familiar with the site. Discuss what role(s) and/or actions you would be expected to take if the licensee had to implement site emergency response procedures.
- 4. Examine the licensee's emergency response classification chart. Given a range of possible scenarios, be able to classify the event per the licensee's NRC approved EAL scheme.

DOCUMENTATION: (OJT-3) On-Site Inspector Emergency Response

Issue Date: 09/24/21 85 1245 Appendix A

### Basic-Level On-the-Job Activity

TOPIC: (OJT-4) Licensee Plan-of-the-Day Meeting, Documents, or Information (for

power reactor and construction inspectors only)

PURPOSE: The purpose of this activity is to (1) acquaint you with the various types of

information discussed in the plan-of-the-day (POD) meeting, (2) instruct you in the types of information provided in the POD that is important to an inspector, and (3) inform you of the appropriate inspector protocols so that you will know when NRC participation is and is not appropriate. Note: G-115, "Practical Applications of Reactor Technology (PART)," is an optional

course that teaches the training objectives in OJTs-1, 2, and 4.

COMPETENCY

AREAS: INSPECTION

COMMUNICATION SELF-MANAGEMENT

LEVEL OF

EFFORT: 2 hours

REFERENCES: None

EVALUATION CRITERIA:

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

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

TASKS:

- 1. Discuss with a qualified inspector the types of information provided at the meeting or in a POD document that would be important to you and why that information would be important.
- Discuss with a qualified inspector the protocols of when an NRC inspector should and should not participate in the licensee's discussions.
- 3. Review the licensee's overview organization chart and either observe a POD meeting with a qualified inspector or review a POD document with a qualified inspector.

Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation 4. criteria section.

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-4. DOCUMENTATION:

1245 Appendix A Issue Date: 09/24/21 87

### Basic-Level On-the-Job Activity

TOPIC: (OJT-5) Inspection Activities

PURPOSE: The purpose of this activity is to familiarize you with inspection tasks

commonly performed by an inspector. This OJT will prepare you to independently plan and conduct the baseline inspection program, as

defined in the applicable IMC.

COMPETENCY

AREAS: INSPECTION

COMMUNICATION

TEAMWORK

**SELF-MANAGEMENT** 

LEVEL OF EFFORT:

Note: The objective of this activity is to make sure that you have experienced the full range of inspection activities. The time needed to complete the tasks will depend on your individual proficiency. There is no set number of inspections you must complete. You must participate in inspections until such time as you can address the evaluation criteria to the satisfaction of your supervisor.

REFERENCES:

- 1. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
- 2. IMC 2515, "Light Water Reactor Inspection Program-Operations Phase;" IMC 2545, "Research and Test Reactor Inspection Program;" or IMC 2503, "Construction Inspection Program-Inspection of Inspections, Tests, Analyses and Acceptance Criteria" and IMC 2504, "Construction Inspection Program Inspection of Construction and Operational Programs" for construction inspectors.
- 3. NUREG-1649, "Reactor Oversight Process" (for power reactor inspectors only)
- 4. UFSARs or SARs for activity to be inspected
- 5. Inspection planning guidance (For research and test reactor inspectors see IMC 0615 and IMC 2545)

# EVALUATION CRITERIA:

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

- 1. Describe the contents and purpose of the site-specific inspection plan located in the Reactor Program System (RPS) application
- 2. Describe the purpose of the inspection planning call.

- 3. Provide your supervisor with a specific inspection plan that you have prepared. Describe the purpose and contents of a specific inspection plan.
- 4. Discuss the documents to be reviewed, including their content and purpose, before an inspection.
- 5. Describe the contents and purpose of the part of the entrance meeting you conducted.
- 6. Describe the activities you accomplished during the inspection(s) and their purpose.
- 7. Describe the purpose of the management brief and the exit pre-brief of licensee management in which you participated.
- 8. Describe the contents and purpose of the part of the exit meeting you conducted.

TASKS:

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

Issue Date: 09/24/21 89 1245 Appendix A

- 8. Observe an exit pre-brief of licensee management.
- 9. Observe an exit meeting.
- 10. Participate as an active member in an inspection by doing the following:
  - a. drafting a portion of the inspection-specific plan
  - b. conducting activities described in No. 6 above, as appropriate
  - c. as deemed appropriate by your supervisor, conducting a portion of the following:
    - i. the entrance meeting
    - ii. the briefing of NRC management.
    - iii. the pre-brief of licensee management
    - iv. the exit meeting
- 11. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-4.

# Basic-Level On-the-Job Activity

TOPIC: (OJT- 6) Documenting Inspection Findings

PURPOSE: The purpose of this activity is to give guidance on content, format, and

style for inspection reports. The objectives of this activity are to ensure that inspection reports (1) clearly communicate significant inspection results to licensees, NRC staff, and the public, (2) provide a basis for significance determination and enforcement action, and (3) present information associated with significant inspection findings in a manner that will be useful to NRC management in developing longer-term, broad

assessments of licensee performance.

**COMPETENCY** 

AREAS: FUNDAMENTAL PLANT DESIGN AND OPERATION

INSPECTION COMMUNICATION TEAMWORK

ASSESSMENT AND ENFORCEMENT

LEVEL OF

EFFORT: 45 hours

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

#### REFERENCES:

- 1. IMC 0310 "Aspects Within the Cross-Cutting Areas" or IMC 0613, Appendix F, "Construction Cross Cutting Components and Aspects" for construction inspectors
- 2. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
- 3. IMC 0609, "Significance Determination Process (SDP)" (for power reactor inspectors only) or IMC 2519, "Construction Significance Determination Process" (for construction inspectors only)
- 4. IMC 0609, Attachment "Initial Characterization of Findings" (for power reactor inspectors only)
- 5. IMC 0609, Appendix A "The SDP for Findings At-Power" (for power reactor inspectors only)

Issue Date: 09/24/21 91 1245 Appendix A

- IMC 0611, "Power Reactor Inspection Reports;" IMC 0613, "Documenting 10 CFR Part 52 Construction and Test Inspection;" IMC 0616, "Fuel Cycle Safety and Safeguards Inspection Reports;" or IMC 0615, "Research and Test Reactor Inspection Reports" (specifically those sections that pertain to documenting inspection findings)
- 7. IMC 0612, Appendix B, "Issue Screening" or IMC 0613, Appendix B, "Issue Screening" (for construction inspectors only)
- 8. IMC 0612, Appendix E, "Examples of Minor Issues"
- 9. IMC 0620, "Inspection Documents and Records"
- 10. Management Directive 8.4, "Management of Backfitting Forward Fitting, Issue Finality and Information Requests
- 11. Enforcement Policy (refer to the NRC Web site)
- 12. Reactor Program System Desktop Guide and Training Videos available at the following:

Training Videos: <a href="https://usnrc.sharepoint.com/teams/NRR-RPS-Replacement-Workspace/Pages/ISTAR.aspx">https://usnrc.sharepoint.com/teams/NRR-RPS-Replacement-Workspace/Pages/ISTAR.aspx</a>

### Desktop Guide:

https://rrps.nrc.gov/inspections/assets/Help Documentation.pdf

# EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of documenting inspection findings by successfully completing the following:

- 1. Discuss the thresholds for determining what findings should be documented in an inspection report.
- 2. Describe the relationship between an issue of concern, performance deficiency, and cross-cutting aspect.
- 3. Describe standards which could be used to define a performance deficiency and why deviating from these standards may not be a violation of NRC requirements.
- 4. Describe how to process a finding using the screening questions of a particular SDP appendix (or the cSDP guidance for construction inspectors) and the possible outcomes. (For power reactor and construction inspectors only)
- 5. Describe how traditional enforcement (TE) violations are processed. Consider TE violations associated with (and without) a performance deficiency. (For power reactor and construction inspectors only)

Issue Date: 09/24/21 92 1245 Appendix A

- 6. Discuss how to write an inspection report input.
- 7. Discuss how to write a violation. Contrast the differences in documenting a non-cited violation and an apparent violation; and for power reactor inspectors, a violation that is not suitable for evaluation using the SDP.
- 8. Contrast the difference between documenting inspector-identified and licensee-identified violations (format, threshold, cross-cutting aspects, tracking, etc.). (For power reactor and construction inspectors only)
- 9. Enter a Licensee Event Report or inspection finding into the Reactor Program System (RPS) database.
- 10. Prepare an inspection report writeup that does not inadvertently impose a backfit on a licensee or prevent the NRC from enforcing regulatory issues in the future.

TASKS:

- 1. Use IMC 0609, IMC 0611, IMC 0612; IMC 0613 and IMC 2519; IMC 0615; or IMC 0616 as applicable, to determine whether an identified issue is above the threshold for documentation.
- Use IMC 0612, Appendix B and IMC 0310 to identify the crosscutting aspect associated with a finding or if the issue should be entered into the Very Low Safety Significance Issue Process. Construction inspectors use IMC 0613, Appendix F, to identify the construction crosscutting aspect. (For power reactor and construction inspectors only)
- 3. Use IMC 0609, Attachment 4 and IMC 0609, Appendix A to process a finding using the screening questions. Construction inspectors use IMC 2519. (For power reactor and construction inspectors only)
- 4. Use IMC 0611, IMC 0613, IMC 0615, or IMC 0616, as applicable, and other available guidance, to draft an inspection report input.
- 5. Given a violation of regulatory requirements and the enforcement policy and guidance, write the analysis and enforcement sections for a finding, a violation, and a non-cited violation; and for power reactor and construction inspectors, a finding with a safety culture cross-cutting aspect.
- 6. Use IMC 0330 and IMC 0620 to describe how to determine the documents that must be included as attachments to an inspection report for the agency record.

Issue Date: 09/24/21 93 1245 Appendix A

- If your office uses RPS, use the RPS Desktop Guide and associated training videos to enter a (1) Licensee Event Report (LER),
   Unresolved Item (URI), 3) Traditional Enforcement Severity Level IV violation, or 4) Green ROP violation into the licensee Plant Issues Matrix Database.
- 8. Describe with your supervisor or training coordinator how an inspection report writeup can inadvertently impose a backfit on a licensee or prevent the NRC from taking additional enforcement action to address an issue.

### DOCUMENTATION:

Obtain your supervisor's signature in the line item for Basic-Level Certification Signature Card Item OJT-6.

Issue Date: 09/24/21 94 1245 Appendix A

# Basic-Level Signature Cards and Certification

Inspector Name:	Employee Initials/Date	Supervisor's Signature/Date
A. Training Courses	mittaio/Bato	<u>Oignataro/Bato</u>
Note: G-115, "Practical Applications of Reactor Technology (PART)" is ar objectives in OJTs-1, 2, and 4.	n optional course th	at teaches the training
H-100, Site Access Training (or licensee site access)		
R-100, Reactor Concepts (for power reactor and construction inspectors only)		
P-105, PRA Basics for Regulatory Applications (for power reactor and construction inspectors only)		
G-105, Conducting Inspections		
Ethics Training for New NRC Employees		
Allegations Process		
Information Security (INFOSEC) Awareness		
Non-Concurrence Process		
Differing Professional Opinion		
Industrial Safety Courses (Health, Safety, and Security Curriculum (MC-1245))		
B. Individual Study Activities		<b>'</b>
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission		
ISA-2 Navigating the NRC's Internal and External Web Sites		
ISA-3 Inspector Objectivity, Protocol, and Professional Conduct		
ISA-4 Fitness-for-Duty Rule		
ISA-5 Allegations		
ISA-6 NRC's Response to an Emergency at a Nuclear Facility		
ISA-7 The Enforcement Process		
ISA-8 The Office of Investigations		
ISA-9 Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page		
ISA-9a Exploring the Construction Inspection Program and the Construction Reactor Oversight Program's Internal Web Page (for construction inspectors only)		
ISA-10 Performance Indicator Program		
ISA-11 Augmented Inspection Team, Special Inspection Team, and Incident Inspection Team Activities		
ISA-12 Understanding How the Commission Operates		
ISA-13 Organization and Content of the NRC Inspection Manual		
ISA-14 NRC Interagency Agreements		
ISA-15 Interactions with the Public		
ISA-16 Contacts with the Media		
ISA-17 Institute of Nuclear Power Operations, Nuclear Energy Institute, and National Organization of Test, Research and Training Reactors		
ISA-18 The Freedom of Information Act and the Privacy Act		
ISA-19 Entrance and Exit Meetings		
ISA-20 Documenting Inspection Findings		
	I	

	Employee Initials/Date	Supervisor's Signature/Date
ISA-21 Open, Collaborative Working Environment & Ways to Raise Differing Views		
ISA-22 Overview of 10 CFR Part 50 (for power reactor and construction inspectors only)		
ISA-22a Overview of 10 CFR Part 52 (for construction inspectors only)		
ISA-23 Overview of 10 CFR Part 19 and 10 CFR Part 20		
ISA-24 Licensee-Specific Regulatory Documents and Procedures		
ISA-25 Security Requirements for Nuclear Power Plants (for power reactor and construction inspectors only)		
ISA-26 Exploring the Operating Reactor Assessment Program (for power reactor and construction inspectors only)		
ISA-26a Exploring the Construction Assessment Program (for construction inspectors only)		
ISA-27 Generic Communications		
C. On-the-Job Training Activities	-	
OJT-1 Facility Familiarization Tour with a Qualified Inspector		
OJT-2 Control Room Tour with Resident or Other Qualified Inspector		
OJT-3 On-Site Inspector Emergency Response		
OJT-4 Licensee Plan-of-the-Day Meeting (for power reactor and construction inspectors only)		
OJT-5 Inspection Activities		
OJT-6 Documenting Inspection Findings		

Supervisor's Certification		
For Basic Inspector Qualification	Signature/Date	

This signature card and certification must be accompanied by the appropriate Form 1, Basic Level Equivalency Justification, if applicable. (The electronic signature card, which is located on the Digital City SharePoint website is also acceptable.) Record completion in TMS by sending a request to <a href="mailto:TrainingSupportResource@nrc.gov">TrainingSupportResource@nrc.gov</a>.

Copies to: Inspector Supervisor

Form 1: Basic-Level Equivalency Justification			
Inspector Name:	Identify equivalent training and experience for which the inspector is to be given credit.		
A. Training Courses			
H-100, Site Access Training (or licensee site access)			
R-100, Reactor Concepts (for power reactor and construction inspectors only)			
P-105, PRA Basics for Regulatory Applications (for power reactor and construction inspectors only)			
G-105, Conducting Inspections			
Ethics Training for New NRC Employees			
Allegations Process			
Information Security (INFOSEC) Awareness			
Non-Concurrence Process			
Differing Professional Opinion			
Industrial Safety Courses (Health, Safety, and Security Curriculum (MC-1245))			
B. Individual Study Activities	1		
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission			
ISA-2 Navigating the NRC's Internal and External Web Sites			
ISA-3 Inspector Objectivity, Protocol, and Professional Conduct			
ISA-4 Fitness-for-Duty Rule			
ISA-5 Allegations			
ISA-6 The NRC's Response to an Emergency at a Nuclear Facility			
ISA-7 The Enforcement Process			
ISA-8 The Office of Investigations			
ISA-9 Exploring the Operating Reactor Inspection Program and the Reactor Oversight Program's Internal Web Page			
ISA-9a Exploring the Construction Inspection Program and the Construction Reactor Oversight Program's Internal Web Page (for construction inspectors only)			
ISA-10 Performance Indicator Program			
ISA-11 Augmented Inspection Team, Special Inspection Team and Incident Inspection Team Activities			
ISA-12 Understanding How the Commission Operates			
ISA-13 Organization and Content of the NRC Inspection Manual			
ISA-14 NRC Interagency Agreements			

Issue Date: 09/24/21 97 1245 Appendix A

Form 1: Basic-Level Equivalency	Justification		
Inspector Name:		Identify equivalent training and e for which the inspector is to be g	
ISA-15 Interaction with the Public			
ISA-16 Contacts with the Media			
ISA-17 Institute of Nuclear Power Operat Institute, and National Organization Training Reactors			
ISA-18 The Freedom of Information Act a	and the Privacy Act		
ISA-19 Entrance and Exit Meetings			
ISA-20 Documenting Inspection Findings			
ISA-21 Open, Collaborative Working Env Differing Views	rironment & Ways to Raise		
ISA-22 Overview of 10 CFR Part 50 (for construction inspectors only)	power reactor and		
ISA-22a Overview of 10 CFR Part 52 (for only)	construction inspectors		
ISA-23 Overview of 10 CFR Part 19 and	10 CFR Part 20		
ISA-24 Licensee-Specific Regulatory Doc	cuments and Procedures		
ISA-25 Security Requirements for Nuclea reactor and construction inspecto			
ISA-26 Exploring the Operating Reactor power reactor and construction in	spectors only)		
ISA-26a Exploring the Construction Asse construction inspectors only)	ssment Program (for		
ISA-27 Generic Communications  C. On-the-Job Training Activities			
OJT-1 Facility Familiarization Tour with	a Qualified Inspector		
OJT-2 Control Room Tour with Resident Inspector	or Other Qualified		
OJT-3 On-Site Inspector Emergency Res	sponse		
OJT-4 Licensee Plan-of-the-Day Meeting construction inspectors only)	g (for power reactor and		
OJT-5 Inspection Activities			
OJT-6 Documenting Inspection Findings			
Supervisor's Recommendation	Signature/Date		
Division Director's Approval	Signature/Date		
Copies to: Inspector Supervisor			

Issue Date: 09/24/21 98 1245 Appendix A

Attachment 1: Revision History for IMC 1245, Appendix A

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	ML062400467 10/31/06 CN 06-032	To increase training associated with documenting finding and violations in inspection reports (ISA-20 and OJT-5), to update references, and to incorporate minor editorial changes. Completed 4-year historical CN search	None	ML 062890456
N/A	ML073520643 01/10/08 CN 08-001	Add training on performance indicators and updated various references and training activities.	None	ML073510727
N/A	ML090360512 07/08/09 CN 09-017	Adds a minor training task to ISA-26 (scanning IMC 0320, "Operating Reactor Security Oversight Process"), updates various Web addresses, and expands the scope of training on the differing professional opinion process to include open, collaborative working environment and ways to raise differing views.	None	ML091590710
N/A	ML11175A312 12/29/11 CN 11-044	This revision adds industrial safety courses as required training, adds a task to familiarize staff with the NRC Knowledge Center to ISA-2, adds guidance on ethics from OGC's Website to ISA-3, adds evaluation criteria and updates references and terminology regarding allegations to ISA-5, adds training on documenting violations to ISA-7, adds guidance on performance indicators to ISA-10, adds a new independent study activity (ISA-27) on Generic Communication, and updates references and guidance.	None	ML11308A645

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	ML12241A367 12/19/12 CN 12-029	This revision updates training on the significance determination process in OJT-5 to reflect recent changes to IMC 0609, "Significance Determination Process."	None	Closed FF: 1245A-1822
N/A	ML15181A320 01/13/16 CN 16-002	This revision incorporates the qualification of construction inspectors (IMC 1252), clarifies required training courses, and replaces Task 1 with online training in ISA 21. The revision also updates IMC format, references (including deleting IMC 0300 from ISA 9 and IMC 0320 from ISA 26), and safety culture training to conform to the safety culture common language initiative.	None	ML15195A140 Closed FF: 1245-1918 ML13325B064 1245A-2108 ML15009A288 1245A-2124 ML15254A011
N/A	ML16049A199 02/24/16 CN 16-008	This revision updates the link to the Memorandum of Agreement with INPO listed in ISA-17	None	N/A
N/A	ML17072A323 08/24/17 CN 17-015	This revision updates references, adds a training course on DPO to ISA-21 adds training on several sections of 10 CFR 50 to ISA-22 and adds direction to record completion of Appendix A in iLearn. In addition, this revision updates the construction inspector knowledge requirements for ISA-9a and ISA 20 to incorporate requirements previously in IMC 1252.	None	ML17089A362
N/A	ML18047A121 07/30/18 CN 18-023	This revision accounts for the creation of IMC 611.		ML18065A650 Closed FF: 1245A-2262 ML18134A013

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	ML20077L269 08/12/20 CN 20-038	This revision was primarily an administrative update in that it removed references to out of date websites and applications (e.g. it substituted TMS for iLearn).  This revision also created OJT-3 On-Site Inspector Emergency Response to address recommendations submitted in feedback form 2319 which identified knowledge gaps in the emergency response area when not fully qualified inspectors are utilized to provide site coverage during staffing shortfalls. It also addressed feedback form 2300 which identified ISA-16 "Contacts With The Media" did not provide guidance to reflect NRC expectations regarding use of social media.  (ISA-6) NRC's Response to an Incident at a Nuclear Facility was significantly revised to reflect changes to the NRC incident response program (and does not contain redline text to annotate those changes).  A link is now provided to electronic signature cards on Digital City	None	ML20079E413  Closed FF 1245-2300 ML20223A146 1245-2319 ML20223A157
N/A	ML21166A349 09/24/21 CN 21-032	This revision updated websites that had expired, corrected format items and added a supervisory signature to the qualification signoff page that was inadvertently removed during a previous revision to the document.	None	ML21173A074

Issue Date: 09/24/21 Att1-3 1245 Appendix A