

# **COMMUNICATION PLAN:**

## **The Office of Nuclear Material Safety and Safeguards, Division of Fuel Management QUALIFICATIONS WORKING GROUP**

### **PURPOSE**

The objective of this Communication Plan is to deliver clear and concise messages regarding the effort to develop a well-structured and consistent qualifications program in the Division of Fuel management (DFM).

### **KEY MESSAGES**

1. The qualification process should be easy to: understand what is required and where to find the relevant information.
2. Qualifications are an important part of demonstrating the competence of our technical reviewers, inspectors, and project managers.
3. Having qualified staff at the U.S. Nuclear Regulatory Commission (NRC) is vital to upholding our reputation as an international “gold standard” nuclear regulator.
4. Having a robust, fair, and consistent qualification program is in line with our organizational values, specifically Integrity and Excellence
5. Subject Matter Experts should play an integral role in the qualification process for staff.
6. All materials used in the qualification process should be readily available to staff in an easily accessible location.
7. Consistency in the qualification process across the Office of Nuclear Material Safety and Safeguards (NMSS) divisions is a benefit to the staff and the Agency as a whole.
8. Input from multiple staff across the divisions within NMSS on the restructuring of the qualifications process will provide for a more robust qualifications process.

### **BACKGROUND**

In October 2019, the Division of Spent Fuel Storage and Transportation and the Division of Fuel Cycle Safety, Safeguards and Environmental Review merged to form DFM. In October 2021, the staff reported on the results of a self-assessment of the merger (Agencywide Documents Access and Management System [ADAMS] Accession No. [ML21279A297](#)) which identified, in part, areas in need of additional attention to implement the merger successfully. One area identified for further attention was staff qualification programs and specifically the need to standardize the qualification programs across business lines. It was recognized that those participating in a qualification program at the time of the merger were using a variety of sources, including draft qualification journals and qualification journals containing outdated information or references. Furthermore, staff in the process of being qualified experienced variations in qualification board composition, expectations for proficiency, and the process (e.g., some more experienced staff were given exemptions from a qualification board while others were not).

Recently, DFM has increased hiring of entry level staff, across both business lines, who will need to be qualified in order to complete safety reviews related to radioactive material and spent fuel storage and transportation as well as fuel cycle facilities.

The staff proposed an initiative to DFM management to address the challenges related to qualification using a working group (WG) within DFM to address both the near and far term qualification needs of staff.

**DIVISION GUIDANCE FRAMEWORK**

Currently a Division Instruction on qualifications, “Administrative Process for Qualification”, (ADM-FM-5) is under revision and will be finalized as part of the work of the WG.

**AUDIENCE**

The communication actions described in this communication plan can be directed to the stakeholders listed below.

External Stakeholders:

- Applicants, Licensees, and Certificate Holders
- Members of the public
- Media representatives

Internal Stakeholders:

- Divisions within NMSS
- NRC Regional Offices

**COMMUNICATION TEAM**

Name	Role	Organization	Contact

## COMMUNICATION TOOLS

This communication plan and associated information will be provided to the NMSS staff for use, as needed. Information that will be prepared and maintained by the communication team ***includes a list of questions and answers (below) for use in communicating with both internal and external stakeholders.***

### Internal Stakeholders:

- Briefings to the NRC management as needed to provide information on the progress of the qualifications WG.
- Outreach to Regions on WG activities that maybe of interest
- Distribution of this communication plan for consistent messaging with external stakeholders.

### External Stakeholders:

- The communication team will provide information to the Office of Public Affairs, the Office of Congressional Affairs, and other staff, as appropriate.

## TIMELINE

Step	Action	Date
1		
2		
3		
4		
5		

## PLAN IMPLEMENTATION

- The communication team leader will compile and centrally locate all pertinent information and ensure its accessibility, consistent with the NRC requirements and guidelines, to internal and external stakeholders.
- The communication team leader will inform the communication team of the need to enter/revise the communication plan as necessary.
- The communication team will establish and maintain questions and answers relating to the SONGS task force recommendations and findings.

### Internal Communications:

- The communication team will coordinate the need for communications with internal and external stakeholders beyond those identified in the communication plan.

### External Communications:

- The communication team will be responsible for communications with external stakeholders.

## QUESTION AND ANSWERS

- Q1.** Are staff within DFM required to be qualified within their specific technical area of expertise to maintain their position within DFM?
- A1.** [DRAFT] There are currently no formal requirements for any staff member within DFM to be qualified; however, it is understood that certain specific functions within the division (e.g., technical review and inspection) should be carried out by qualified individuals.
- Q2.** If there is no specific requirement for qualification in DFM, is there a management expectation for DFM staff to use a qualification program for the consistent implementation of their position and technical area of expertise within DFM?
- A2.** [DRAFT] In general, there is an expectation that individuals would go through a qualification process if one has been established for their position/job function.
- Q3.** Does the current DFM qualification program encompass all positions and areas of technical expertise within DFM? If not, will this effort encompass the remaining positions and areas of technical expertise in DFM?
- A3.** [DRAFT] No. Not all positions or job functions in DFM require qualification.
- Q4.** Will this effort, and any of the WG recommended actions to address the previous challenges related to qualification in DFM, change the current qualification status of individual DFM staff?
- A4.** [DRAFT] No.
- Q5.** How does this effort and any recommended actions to address the previous challenges related to qualification in DFM consider DFM staff that are currently qualified using established agencywide qualification programs, such as the DFM staff that are currently qualified as NRC Inspectors?
- A5.** [DRAFT] See answer "A4" above.
- Q6.** Will this effort change the qualification process for staff in DFM?
- A6.** [DRAFT] Possibly. The effort may identify areas for improvement in the qualification process which could lead to changes in how qualifications are achieved.
- Q7.** Will the work of the WG impact staff that are currently in the qualification process?
- A7.** [DRAFT] No, however, those currently in the process of qualifications may be asked to provide feedback to the WG to assist in its efforts.

- Q8.** How do previously qualified DFM staff fulfill any new recommended actions from this effort? Is there a certain timeline/deadline to be imposed for completion of any new recommended actions?
- A8.** [DRAFT] Should any specific actions that could potentially impact previously qualified DFM staff be recommended by the WG, the timeline for completion of any such recommended actions will be coordinated with the effected staff and their respective supervisors.
- Q9.** Does this new effort and any recommended actions to address the previous challenges related to qualification in DFM include future program auditing and updates (as appropriate) to the envisioned qualification program on a certain periodicity? If yes, what branch or group (management and staff) in DFM would be responsible for the auditing and updating of the qualification program going forward?
- A9.** [DRAFT] The WG intends to examine how the established qualification process might be audited and updated with a reasonable frequency and will consider what resources might be necessary to appropriately maintain the qualification process in the Division.
- Q10.** Will this DFM effort include internal NRC and/or external federal agency benchmarking for best practices?
- A10.** [DRAFT] Consideration of best practices will be part of the WG's efforts.