

# **NRC INSPECTION MANUAL**

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## **INSPECTION MANUAL CHAPTER 1245 APPENDIX C5**

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### **NON-POWER PRODUCTION AND UTILIZATION FACILITY TECHNICAL PROFICIENCY TRAINING AND QUALIFICATION JOURNAL**

Effective Date: 09/22/2025

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## INTRODUCTION

Completion of IMC 1245, Appendix A is highly recommended before beginning activities or courses in this standard, but the trainee's branch chief can override this recommendation based on the trainee's experience. You may complete the General Proficiency requirements contained in Appendix B together with the Technical Proficiency requirements outlined in this journal.

## REQUIRED NON-POWER PRODUCTION AND UTILIZATION FACILITY INSPECTOR TRAINING COURSES

- Research and Test Reactor Technology: Introduction (R-106)
- Research and Test Reactor Technology: Regulatory Oversight (R-206)
- Research and Test Reactor Technology: Nuclear Theory (R-306)
- Research and Test Reactor Technology: Operation (R-406)
- (CLE) Environmental Monitoring and Air Sampling for Radioactivity (H-130S)
- Environmental Monitoring and Air Sampling for Radioactivity Lab (H-130L)
- (CLE) Fundamental Health Physics (H-122S)
- Advanced Health Physics (H-201)
- (CLE) Transportation of Radioactive Materials (H-308S)
- NRC Materials Control, Security Systems & Principles (S-201)
- Security Fundamentals (S-301)
- Safety Culture Reactor Oversight Process (ROP) Training

**NOTE:** Before signing up for any course, be sure that you have met any prerequisites. Additionally, courses listed with "CLE" are self-study and cannot be completed via the Talent Management System (TMS). They are hosted in the HRLD's Collaborative Learning Environment (CLE), which is a separate system.

Non-Power Production and Utilization Facility Inspector  
Individual Study Activities

## (ISA-NPUF-1) Overview of Standards and Regulatory Guides

### PURPOSE:

The purpose of this activity is to familiarize the inspector with non-power reactor and utilization facilities (NPUFs) various standards and regulatory guides (RGs) for inspection activities of licensees. These sections collectively form the framework for how NRC licensees must manage radiation safety to protect workers and the public.

Inspectors routinely evaluate and review a variety of documents as they pertain to specific facilities to support their inspection activities. Often, the inspector will find situations where regulations, standards, and RGs can provide useful guidance to successfully perform your assigned responsibilities. This ISA will acquaint you with common NPUF regulations, standards, and regulatory guides and will help you learn the different ways NRC regulations and requirements are implemented by licensees.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 18 hours

### REFERENCES:

1. Inspection Procedure (IP) 69001, "Class II Research and Test Reactors"
2. IP 69002, "Class III Research and Test Reactors"
3. IP 69004, "Class I Research and Test Reactor Effluent and Environmental Monitoring"
4. IP 69009, "Class I Research and Test Reactor Fuel Movement"
5. NUREG-1537, "Guidelines for Preparing and Reviewing Applications for the Licensing of Non-Power Reactors"

### EVALUATION CRITERIA:

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

1. Locate and explain the referenced NPUF standards and RGs.
  - a. RG 2.2, "Development of Technical Specifications for Experiments in Research Reactors," November 1973
  - b. RG 2.5, "Quality Assurance Program Requirements for Research and Test Reactors," June 2010
  - c. RG 2.6, "Emergency Planning for Research and Test Reactors and Other Non-Power Production and Utilization Facilities," September 2017

2. Find and explain significant features of specific guidance in the below ANSI standards.
  - a. ANSI/ANS-15.1-2007, "The Development of Technical Specifications for Research Reactors"
  - b. ANSI/ANS-15.2-1999, "Quality Control for Plate-Type Uranium-Aluminum Fuel Elements"
  - c. ANSI/ANS-15.11-2016, "Radiation Protection at Research Reactor Facilities"
  - d. ANSI/ANS-15.16-2015, "Emergency Planning for Research Reactors"
  - e. ANSI/ANS-15.21-2012, "Format and Content for Safety Analysis Reports for Research Reactors"

**TASKS:**

1. Locate the referenced ANSI NPUF standards and NRC RGs.
2. Review the table of contents of each of the referenced standards.
3. Review and become familiar with the main topic areas of each referenced RG.
4. Read the areas of specific guidance referenced above in item 2 of the evaluation criteria.
5. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

**DOCUMENTATION:**      Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item ISA-NPUF-1

## (ISA-NPUF-2) Overview of 10 CFR Parts 30, 70, and 71

### PURPOSE:

The purpose of this activity is to acquaint the inspector with the regulatory framework for the safe and secure handling of radioactive material. This individual study activity will help the inspector understand that Parts 30 and 70 define who can have what radioactive material and how they should generally manage it, while Part 71 dictates how radioactive material must be safely and securely packaged and moved from one location to another.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 12 hours

### REFERENCES:

1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
2. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"
3. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
4. IP 69001, "Class II Research and Test Reactors"
5. IP 69002, "Class III Research and Test Reactors"
6. IP 69004, "Class I Research and Test Reactor Effluent and Environmental Monitoring"
7. IP 86001, "Design, Fabrication, Testing, and Maintenance of Transportation Packagings"
8. IP 86740, "Inspection of Transportation Activities"
9. RG 2.5, "Quality Assurance Program Requirements for Research and Test Reactors," June 2010
10. RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material," June 2015

### EVALUATION CRITERIA:

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

1. State the purpose of 10 CFR Parts 30, 70, and 71. Discuss procedures and criteria for issuing licenses related to the handling, possession, and use of special nuclear material.
2. Discuss requirements for packaging, quality assurance requirements, and operational controls for packaging and transporting licensed radioactive materials.

3. Become familiar with the content of the regulations that apply to NPUFs.

**TASKS:**

1. Read those sections of the regulations which apply to NPUFs in 10 CFR Parts 30, 70, and 71.
2. Part 30 governs byproduct material, while Part 70 governs special nuclear material. Discuss how these parts establish the initial authorization for a person or entity to possess and use these specific types of radioactive materials.
3. Part 71 governs the movement of these materials. Discuss how a Part 30 licensee transporting a large quantity of byproduct material, or a Part 70 licensee transporting SNM, must ensure their packages meet Part 71 standards.
4. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

**DOCUMENTATION:**      Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item ISA-NPUF-2



## (ISA-NPUF-3) Overview of 10 CFR Parts 37, 73, and 74

### PURPOSE:

The purpose of this activity is to familiarize you with NPUF standards and RGs for security and control of radioactive and nuclear materials. These regulations collectively form the framework for ensuring the physical protection of radioactive and nuclear materials from theft, diversion, sabotage, or unauthorized access.

Inspectors must routinely evaluate and review a variety of documents as they pertain to specific facilities to support their inspection activities. This individual study activity will acquaint you with the regulations for security of NPUFs standards and RGs implemented by licensees.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 10 hours

### REFERENCES:

1. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
2. 10 CFR Part 73, "Physical Protection of Plants and Materials"
3. 10 CFR Part 74, "Material Control and Accounting of Special Nuclear Material"
4. ANSI/ANS-15.11-2016, "Radiation Protection at Research Reactor Facilities"
5. IP 69001, "Class II Research and Test Reactors"
6. IP 69002, "Class III Research and Test Reactors"
7. IP 69009, "Class I Research and Test Reactor Fuel Movement"

### EVALUATION CRITERIA:

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

1. State the purpose of 10 CFR Parts 37, 73, and 74.
2. Discuss design basis threats, transportation security, and safeguards information as outlined in 10 CFR Part 37.
3. Discuss how the key objectives of 10 CFR Part 37 are established with requirements and how inspection procedures verify compliance with license holders.

## TASKS:

1. Read those sections of 10 CFR Parts 37, 73, and 74 which apply to NPUFs.
2. Part 37 focuses on access authorization (background checks), security programs and physical protection during transit of these materials. Review some of the key programmatic requirements of a physical protection program; physical protection in transit (subpart D); physical protection during use (subpart C).
3. Part 73 addresses the physical protection of nuclear power plants, fuel cycle facilities, and various types and quantities of special nuclear material (SNM) (e.g., uranium-235, plutonium-239) and irradiated reactor fuel. Discuss possible threats, design basis threats, key components of a physical protection system and the graded approach to security.
4. Part 74 centers on material control and accounting to prevent and detect unauthorized diversion of special nuclear material through meticulous recordkeeping and inventory practices. Discuss key concepts of each subpart (A-F).
5. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION:      Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item ISA-NPUF-3

## (ISA-NPUF-4) Overview of 10 CFR 50.59

### PURPOSE:

The purpose of this activity is to familiarize the inspector with Standards and Regulatory Guides for plant modifications installed at NPUFs. An NPUF inspector will be required to understand how hardware design changes or changes to the operating requirements of a system can potentially impact on the plant's design and licensing bases, as well as the performance capability of structures, systems, and components (SSCs).

Inspectors will be asked to demonstrate an understanding of plant modifications and the NRC's continuing role in monitoring design changes at NPUFs.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 10 hours

### REFERENCES:

1. 10 CFR 50.59, "Changes, tests, and experiments"
2. ANSI/ANS-15-8.1995, "Quality Assurance Program Requirements for Research Reactors"
3. IP 69001, "Class II Research and Test Reactors"
4. IP 69006, "Class I Research and Test Reactors Organization and Operations and Maintenance Activities"
5. IP 69007, "Class I Research and Test Reactor Review and Audit and Design Change Functions"
6. NEI 96-07, "Guidelines for 10 CFR 50.59 Implementation," November 2000
7. NEI 21-06, "Guidelines for 10 CFR 50.59 Implementation at Non-Power Production or Utilization Facilities," December 2021
8. RG 2.5, "Quality Assurance Program Requirements for Research and Test Reactors," June 2010

### EVALUATION CRITERIA:

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

1. State the inspection objectives for the reviews of facility modifications and indicate why they are important.
2. Identify what portions of the subject regulations apply to NPUFs and which do not apply.

3. Discuss how licensees control modifications both before and after implementation, including affected design documents and facility procedures.
4. Identify key differences between “permanent” and “temporary” facility modifications.
5. Discuss NEI 21-06 changes that are specific to NPUFs.

**TASKS:**

1. Read the references in sufficient detail to perform adequately in accordance with the requirements of the evaluation criteria.
2. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

**DOCUMENTATION:**      Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item ISA-NPUF-4

## (ISA-NPUF-5) Overview of Operator Licensing

### PURPOSE:

The purpose of this activity is to familiarize the inspector with the licensing of individuals who operate or direct the operation of NPUFs. As an NPUF inspector, you will be required to understand standards for the requalification, training, and ongoing performance of NPUF operators. This knowledge ensures that these facilities are operated safely and reliably.

Inspectors will be asked to demonstrate an understanding of the general provisions, medical requirements, applications, written exams, operating tests, licenses, modifications and revocation of licenses as applicable to NPUFs.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 18 hours

### REFERENCES:

1. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities"
2. 10 CFR Part 55, "Operators' Licenses"
3. ANSI/ANS-15.4-2016, "Selection and Training of Personnel for Research Reactors"
4. IP 69001, "Class II Research and Test Reactors"
5. IP 69002, "Class III Research and Test Reactors"
6. IP 69003, "Class I Research and Test Reactor Operator Licenses, Requalification, and Medical Examinations"
7. IP 69006, "Class I Research and Test Reactors Organization and Operations and Maintenance Activities"
8. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," November 1987
9. NUREG-1478, "Operator Licensing Examiner Standards for Research and Test Reactors"

### EVALUATION CRITERIA:

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

1. Discuss key parts of Part 55 as related to medical requirements, training and requalification, license and renewal.

2. Discuss the general conditions and limitations that apply to all licenses issued to operators and senior operators of utilization facilities.
3. Discuss the subparts of Part 55 that an inspector should be familiar with regarding: medical requirements and reporting changes to medical status; maintaining active license status; requalification activities, including but not limited to: reactivity manipulations; annual operations tests and written examinations content and requirements; emergency plan/procedure review and emergency drills; documentation of requalification program requirements. Inspectors should also be familiar with exemption requirements and when an exemption request may be appropriate.
4. Discuss the key components of a licensee's requalification plan, such as requirements for the content of written exams and operating tests, test administration, and frequency of testing. Discuss the options available to a licensee that has been in extended shutdown related to their operator licensing (OL) program to support restart activities and the applicable regulations.

#### TASKS:

1. Review Part 50 and Part 55 for applicable license conditions for the OL program.
2. Discuss the manual chapters that describe the audit and oversight functions for the OL program.
3. Review 10 CFR Part 55, IPs, ANSI standards, and RGs and become familiar with how these documents are utilized for NPUFs.
4. Review the OL program documents for one NPUF licensee, such as the requalification plan, current operator licenses, recent operator license renewal applications, and any recent OL exemption requests.
5. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION:      Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item ISA-NPUF-5

Non-Power Production and Utilization Facility Inspector  
On-the-Job Activity

## (OJT-NPUF-1) Non-Power Production and Utilization Facility Inspection Accompaniments

### PURPOSE:

The purpose of this activity is to acquaint the trainee with the general conduct of NPUF inspections.

COMPETENCY AREA: INSPECTION  
COMMUNICATION  
FUNDAMENTAL FACILITY DESIGN AND OPERATION

LEVEL OF EFFORT: See the hours listed with the referenced inspection procedures at the end of this activity.

REFERENCES: See the list of inspection procedures at the end of this activity.

NOTE: Completion of this on-the-job activity may take five or more inspections.

### EVALUATION CRITERIA:

Upon completion of the tasks, you will be asked to discuss the preparation, conduct, communication and documentation of the various inspection procedures. You will also be asked to discuss the methods used by licensees to implement safety programs and regulatory requirements. You will be asked to explain the facilities, equipment, processes, and activities of the areas you inspect, as well as the criteria, techniques, and mechanics of inspection. You will be asked to demonstrate a level of technical knowledge needed to adequately perform inspection activities at NPUFs.

Some inspection procedures may not be conducted regularly, e.g., inspection procedures related to decommissioning. On completion of the tasks for any one inspection procedure, the inspector should be considered qualified to independently complete that inspection procedure.

### TASKS:

1. Prepare and conduct inspection for each of the referenced inspection procedures at least twice under the supervision of a qualified NPUF inspector.
2. During the inspection, describe your observations and associated safety significance and/or compliance to regulatory requirements with licensee management under the supervision of a qualified NPUF inspector. Following the inspection, discuss your observations with your supervisor and the assigned NRC project manager.
3. Prepare input for an inspection report for each of the referenced inspection procedures under the supervision of a qualified NPUF inspector.
4. With qualified inspectors, discuss and explore the different ways licensees implement safety programs and regulatory requirements applicable to each inspection procedure.



Discuss the facilities and equipment, and the technical bases for their design. Discuss processes and activities of the areas you inspect. Discuss the criteria, techniques, and mechanics of inspection at NPUFs.

5. Witness a drill of the Emergency Plan at an NPUF.
6. Meet with your supervisor or a designated qualified NPUF inspector, discuss any questions you may have, and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION:        Non-Power Production and Utilization Facility Inspector Qualification  
Signature Card Item OJT-NPUF-1

NOTE: The allowed time to complete the inspections is based on the resource estimate in each IP. The same amount of time was allowed to prepare and document the inspection. This time was doubled in consideration of the trainees' status. It was doubled again so that the inspection could be conducted twice for qualification.

#### PROCEDURES:

##### Operations Inspection Procedures:

- IP 69001, "Class II Research and Test Reactors" (270 hours)
- IP 69002, "Class III Research and Test Reactors" (72 hours)
- IP 69003, "Class I Research and Test Reactor Operator Licenses, Requalification, and Medical Activities" (27 hours)
- IP 69004, "Class I Research and Test Reactor Effluent and Environmental Monitoring" (90 hours)
- IP 69005, "Class I Research and Test Reactor Experiments" (27 hours)
- IP 69006, "Class I Research and Test Reactors Organization and Operations and Maintenance Activities" (45 hours)
- IP 69007, "Class I Research and Test Reactor Review and Audit and Design Change Functions" (45 hours)
- IP 69008, "Class I Research and Test Reactor Procedures" (45 hours)
- IP 69009, "Class I Research and Test Reactor Fuel Movement" (36 hours)
- IP 69010, "Class I Research and Test Reactor Surveillance" (64 hours)
- IP 69011, "Class I Research and Test Reactor Emergency Preparedness" (108 hours)
- IP 69012, "Class I Research and Test Reactors Radiation Protection" (162 hours)

#### Special Nuclear Material Inspection Procedures:

- IP 81602, “Fixed Site Physical Protection of Special Nuclear Material of Moderate Strategic Significance–Non-Power Reactors” (144 hours)
- IP 81603, “Fixed Site Physical Protection of Special Nuclear Material of Low Strategic Significance – Non-Power Reactors” (96 hours)
- IP 81606, “Material Control and Accounting – Non-Power Reactors” (24 hours)
- IP 81607, “Protection of Safeguards Information and Safeguards Information-Modified Handling – Non-Power Reactors” (24 hours)
- IP 81608, “Reporting of Safeguards Events – Non-Power Reactors” (8 hours)

#### Category 1 and 2 Radioactive Materials Inspection Procedures:

- IP 81621, “Fixed Site Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material – Non-Power Reactors” (144 hours)
- IP 81622, “In Transit Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material and 100 Grams or Less of Irradiated Reactor Fuel – Non-Power Reactors” (144 hours)

#### Transportation Inspection Procedure:

- IP 86740, “Inspection and Transportation Activities” (45 hours)

Non-Power Production and Utilization Facility Inspector Technical Proficiency-Level  
Signature Card and Certification

Inspector Name: _____	<u>Employee Initials/</u> <u>Date</u>	<u>Supervisor's</u> <u>Signature/Date</u>
<b>A. <u>Training Courses</u></b>		
Research and Test Reactor Technology: Introduction (R-106) Research and Test Reactor Technology: Regulatory Oversight (R-206) Research and Test Reactor Technology: Nuclear Theory (R-306) Research and Test Reactor Technology: Operation (R-406)		
(CLE) Environmental Monitoring and Air Sampling for Radioactivity (H-130S)		
Environmental Monitoring and Air Sampling for Radioactivity Lab (H-130L)		
(CLE) Fundamental Health Physics (H-122S)		
Advanced Health Physics (H-201)		
(CLE) Transportation of Radioactive Materials (H-308S)		
NRC Materials Control, Security Systems & Principles (S-201)		
Security Fundamentals (S-301)		
Safety Culture Reactor Oversight Process (ROP) Training		
<b>B. <u>Individual Study Activities</u></b>		
ISA-NPUF-1 Overview of Standards and Regulatory Guides		
ISA-NPUF-2 Overview of 10 CFR Parts 30, 70, and 71		
ISA-NPUF-3 Overview of 10 CFR Parts 37, 73, and 74		
ISA-NPUF-4 Overview of 10 CFR 50.59		
ISA-NPUF-5 Overview of Operator Licensing		
<b>C. <u>On-the-Job Activity</u></b>		
OJT-NPUF-1 Non-Power Production and Utilization Facility Inspection Accompaniments		

Supervisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor's signature indicates successful completion of all required courses and activities listed in this journal and readiness to appear before the Oral Board.

The appropriate Form 1, "Reactor Operations Inspector Basic-Level Equivalency Justification," must accompany this signature card and certification, if applicable. Additionally, inspectors should consult IMC 1245 Appendix D-1 "Maintaining Qualifications" as applicable, for post qualification and refresher training requirements.

(The electronic signature card, which is located on the ROP Digital City and other internal NRC websites is also acceptable.) Record completion in TMS by sending a request to [TrainingSupport.Resource@nrc.gov](mailto:TrainingSupport.Resource@nrc.gov).

Form 1: Non-Power Production and Utilization Facility Inspector Technical  
Proficiency-Level Equivalency Justification

Inspector Name: _____	Identify equivalent training and experience for which the inspector is to be given credit
<b>A. <u>Training Courses</u></b>	
Research and Test Reactor Technology: Introduction (R-106) Research and Test Reactor Technology: Regulatory Oversight (R-206) Research and Test Reactor Technology: Nuclear Theory (R-306) Research and Test Reactor Technology: Operation (R-406)	
(CLE) Environmental Monitoring and Air Sampling for Radioactivity (H-130S)	
Environmental Monitoring and Air Sampling for Radioactivity Lab (H-130L)	
(CLE) Fundamental Health Physics (H-122S)	
Advanced Health Physics (H-201)	
(CLE) Transportation of Radioactive Materials (H-308S)	
NRC Materials Control, Security Systems & Principles (S-201)	
Security Fundamentals (S-301)	
Safety Culture Reactor Oversight Process (ROP) Training	
<b>B. <u>Individual Study Activities</u></b>	
ISA-NPUF-1 Overview of Standards and Regulatory Guides	
ISA-NPUF-2 Overview of 10 CFR Parts 30, 70, and 71	
ISA-NPUF-3 Overview of 10 CFR Parts 37, 73, and 74	
ISA-NPUF-4 Overview of 10 CFR 50.59	
ISA-NPUF-5 Overview of Operator Licensing	
<b>C. <u>On-the-Job Activity</u></b>	
OJT-NPUF-1 Non-Power Production and Utilization Facility Inspection Accompaniments	

Supervisor's Approval:                      Signature / Date \_\_\_\_\_

Attachment 1: Revision History for IMC 1245 Appendix C5

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 Numbers (Pre-Decisional, Non-Public Information)
N/A	ML062400476 10/31/06 CN 06-032	To clarify signature requirements, update reference lists, and incorporate minor editorial changes. Completed 4-year historical CN search	None	N/A
N/A	ML090360468 07/08/09 CN-09-017	Updates a course number, replaces course H-201 with H-117, and moves post-qualification and refresher training requirements out of the Appendix and into Appendix D1.	None	N/A
N/A	ML20077L275 06/26/20 CN 20-026	This revision updated references to courses and corrected format items.	None	ML20079E417
N/A	ML25252A392 09/22/25 CN 25-030	This revision updated references to courses, corrected format items, and provided additional information regarding how the qualification of inspectors should be recorded. This change also addressed the training recommendation concerning safety culture that was outlined in OIG-24-A-07. Removed signature for DD on Form 1 – only BC approval is now required for proficiency credit.	None	N/A