

# **NRC INSPECTION MANUAL**

NMSS

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## **INSPECTION MANUAL CHAPTER 1248 APPENDIX J**

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**BASIC-LEVEL TRAINING AND QUALIFICATION JOURNAL FOR  
MATERIALS, DECOMMISSIONING, AND URANIUM RECOVERY PROGRAMS  
IN THE OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS**

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## INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) Basic Qualification program requires completion of a variety of activities designed to help and prepare you, the candidate, learn information or practice skills important to independently performing this important function. When staff have completed the entire qualification process, they will have demonstrated each of the competencies required of NRC staff members. It is recommended that trainees take Agency Document and Management System (ADAMS) training early in the training process as some training documents are only available in ADAMS.

A competent staff member should:

- Understand the legal basis and the processes used for achieving the NRC's regulatory objectives.
- Acquire a fundamental understanding of the NRC's organizational structure, mission, goals, and objectives.
- Understand the basis for the authority of the agency.
- Understand the processes established to achieve the regulatory objectives.
- Understand the technology and apply concepts in various technical areas to allow the NRC to carry out its overall responsibilities.
- Have the personal and interpersonal skills to independently carry out assigned regulatory activities, either individually or as a member of a team.

## PROGRAM ORGANIZATION

The qualification process develops your awareness of the role of the agency, your role and skill as a reviewer/inspector, and your technical expertise for conducting health and safety and security inspections. The Basic-Level activities are designed to help you develop awareness of the agency's role and the staff member's role. 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 Technical Proficiency Level. After successfully completing the Basic-Level activities, you will be eligible to receive Basic Certification. With a Basic Certification, you may be assigned to perform limited scope activities under an appropriate degree of detailed supervision where you can apply the skill sets that you have recently acquired. The scope of your assigned activities will be controlled by your immediate supervisor. You may be asked to conduct activities but will not be expected to independently reach conclusions, describe official agency positions on evolving issues, or act as an official agency spokesperson.

## QUALIFICATION JOURNAL ORGANIZATION

The qualification journal identifies the training courses, the Independent Study Activities (ISA) and On the Job Training (OJT) activities you must complete. Document your progress on the signature cards and certifications as you move through the qualification process. The journal also contains a form to document the justification for accepting equivalent training or experience as a way to meet qualification requirements. The signature cards, certification, and equivalency justification pages form the permanent record of completing the basic-level qualification program.

Consideration should be given to assigning a qualified staff member to assist you. This person would serve as a resource and mentor by answering any questions or providing guidance as you work to complete this qualification journal.

## COMPETENCIES

The training and qualification program detailed in this qualification journal ensures that every inspector acquires competency in three general areas:

- Area 1: Understand the legal basis and the regulatory processes for achieving the NRC's regulatory objectives by:
  - Acquiring a fundamental understanding of the NRC's organizational structure, mission, goals, and objectives (Regulatory Framework)
  - Understanding the basis for the authority of the agency (Regulatory Framework)
- Area 2: Acquire the techniques and skills needed to collect, analyze, and integrate information using a safety and security focus to develop a supportable regulatory conclusion by:
  - Independently gathering information through objective review, observation, and open communication (Inspection)
  - Evaluating licensing information by conducting an objective review (Licensing Activities)
  - Determining acceptability of information by comparing with established criteria (Inspection and Licensing Activities)
  - Objectively analyzing and integrating information using a safety and security focus to identify the appropriate regulatory conclusion and regulatory response (Enforcement)
- Area 3: Have the personal and interpersonal skills to carry out assigned regulatory activities either individually or as a member of a team by:
  - Expressing ideas or thoughts clearly and respectfully, carefully listening, and speaking and writing with appropriate safety and security focus and context (Communication) Working collaboratively with others toward common objectives (Teamwork)

- Working independently, exercising judgment, and exhibiting flexibility in the completion of activities including during difficult or challenging situations (Self-Management)
- Using technology to locate, gather, manipulate, and share information (Information Technology)

## REQUIRED BASIC LEVEL TRAINING COURSES

These courses can be taken in any order (some of these courses are required outside of the qualification process):

- Site Access Training (Web-based, course H-100S) or Site Access Refresher Training (H-101)
- Occupational Health and Safety (Inspection Manual Chapter (IMC) 1248)
- Ethics Training for New Employees
- Allegation Process

## INTERPERSONAL SKILLS TRAINING

The interpersonal skills training courses listed below are required to be completed before completion of the Technical Proficiency Level, but do not need to be completed before being granted Basic Qualification. However, they can be taken at any time during the qualification process. It is recommended that trainees observe an entrance and exit meeting and discuss the objectives of these meetings, with a qualified inspector before attending the Effective Communication for NRC Inspectors course.

- Effective Communications for NRC Inspectors (Classroom course, register in Training Management System (TMS)).
- Gathering Information for Inspectors through Interviews (Classroom course, register in TMS).
- Media Training Workshop (Classroom course, register in TMS).

## TECHNICAL TRAINING

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

## BASIC-LEVEL INDIVIDUAL STUDY ACTIVITIES

The ISAs direct and focus your efforts as you review documents and perform technical training assignments important to the performance of your job. Each activity begins with a purpose statement informing you of why the activity is important. The evaluation criteria identify what you are expected to achieve upon completing the activity. The evaluation criteria are listed up front so that you can review them first. 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. Each ISA includes an estimate for the level of effort needed to complete all the activities. These estimates are to help guide the staff.

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

- The first three ISAs should be done first. Becoming familiar with the agency, your overall role as an inspector and the NRC's safety culture is important for successfully completing many of the remaining activities. You should also become familiar with the content of the remaining ISAs so that you can complete the ISAs as opportunities arise.
- Complete all assigned parts of each activity.
- Your immediate supervisor will act as a resource as you complete each activity. Your immediate supervisor also may designate qualified staff as mentors 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 immediate supervisor or mentor.
- You are responsible for keeping track of the tasks you have completed. Be sure to complete all the assigned tasks in each activity before meeting with your immediate supervisor for evaluation.

### Basic-Level Individual Study Activity

## (ISA-1) History and Organization of the U.S. NRC and the Commission

### PURPOSE:

The purpose of this activity is to familiarize you with the regulatory history of radioactive material regulation 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 NRC Commissioners and major offices. You will also review how NRC Commissioners establish the approach NRC staff will use to address an issue of agency importance.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 15 hours

### REFERENCES:

1. Title 10 of the *Code of Federal Regulations* (10 CFR)
2. NUREG-0980, "Nuclear Regulatory Legislation" (NUREGs are in the Document Collections section of the NRC Library on the public Web page, select the latest edition)
3. NUREG-1350, "Information Digest"
4. NUREG/BR-0175, "A Short History of Nuclear Regulation, 1946-2009," Revision 2, September 2010
5. Management Directive (MD) 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)"
6. MD 5.8, "Proposed Section 274b Agreements with States"
7. NRC internal and external websites
  - a. Public Sites for About NRC and Commission
  - b. NUREG-1350, NRC Information Digest
  - c. Nuclepedia
  - d. OEDO Hub on SharePoint (non-public); Note: Procedures 350, 520, 530
  - e. Policy-making: Internal Commission Procedures: <https://www.nrc.gov/about-nrc/policy-making/internal.html>
  - f. Office of the Secretary: <https://usnrc.sharepoint.com/sites/secy-hub>
8. 10 CFR
  - a. Part 1, "Statement of Organization and General Information"

b. Part 2.202, "Orders"

9. 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, its interaction with the Commissioners, and development of the commercial, industrial, and medical applications of radioactive material by successfully doing the following:

- Discuss the purpose of the Atomic Energy Act of 1954, as amended.
- Discuss the major regulatory impacts of the Energy Reorganization Act of 1974, as amended.
- Discuss the major regulatory impacts of the Energy Policy Act of 2005.
- Discuss the relationship between the NRC and Agreement States.
- Briefly describe the functions of each major office and circumstances in which your position and your division may interact.
- Locate Commission-related documents on the NRC external agency Websites and discuss how the Commission uses Staff Requirements Memoranda (SRMs) to direct the staff.
- Explain the four main functions of the Commission. Know the current incumbents. Describe the requirements or limitations for Commission members meeting.
- As an independent agency, explain how the Commissioners and Chair are appointed; their term of appointment; and potential actions that may occur (and are not allowed) when the Presidential Administration changes.
- Know the common types and purposes of Commission-related documents, including Policy Statements, SECYs, SRMs, COMs, letters to/from Congressional members, and periodic reports to Congress. Understand how they may apply to your branch or office.
- Explain your actions if a Commissioner or Commissioner's staff directly contacts you and requests an immediate in-person brief or a copy of the draft document you are working on.
- Discuss the relationship between the NRC and the U.S. Department of Energy (DOE).
- Describe the NMSS organization and key management positions.

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

Public Affairs Office. You can find electronic copies of documents on the NRC external Website in the NRC Library.

- Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
- Read about the Commission's direction-setting and policy making activities under the Internal Commission Procedures, especially Chapter I, Commission Responsibilities, and Chapter IV, Commission Meetings/Hearings.
- Read about the different kinds of decision documents issued by the Commission.
- 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.
- Review and discuss the items listed in the evaluation criteria with your immediate supervisor.

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

## (ISA-2) Objectivity, Protocol, and Professional Conduct

### PURPOSE:

The purpose of this activity is to acquaint you with the NRC's expectations of staff member's conduct and protocol. Professionalism is essential to the agency's ability to fulfill its mission of protecting public health and safety and security. Professional conduct is a vital component of the NRC's credibility as an effective regulator. As an NRC staff member, you will often be representing the agency in interactions with a licensee or applicant. This ISA will help you understand NRC procedures, policies, and expectations related to staff conduct. This activity also will help you develop the professional conduct you will need to be an effective NRC staff member.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 hours

### REFERENCES:

- MD 7.5, "Ethics Counseling and Training"
- IMC 1201, "Conduct of Employees"
- Office guidance related to employee conduct
- MD. 7.7, "Prohibited Securities"
- MD 8.17, "Licensee Complaints Against NRC Employees"
- The Ethics page of Office of General Counsel's (OGC) Website
- Ethics Training for New Employees (Web-based, course in TMS)
- IMC 2800, "Materials Inspection Program"
- IMC 2561, "Decommissioning Power Reactor Inspection Program"

### EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of proper NRC employee conduct by successfully addressing the following:

1. Explain the expectations of NRC employees regarding:
  - a. Alcohol and illegal drugs
  - 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 that could result in a loss of impartiality (or the perception thereof):
    - a. Accepting transportation from a licensee
    - b. Attending social functions essentially limited to licensee and contractor attendance
    - c. Coffee clubs, cafeterias, and credit unions
    - d. Property and neighborhood relationships
    - e. Community activities
    - f. Employment of spouse and children
    - g. 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 staff:
    - a. Gifts from outside sources
    - b. Gifts between employees
    - c. Conflicting financial interests
    - d. Impartiality in performing official duties
    - e. Seeking other employment
    - 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 NRC licensed facilities? Your answer should include discussion of the specific areas that NRC management should focus on in assessing staff.
  6. What are NRC employees supposed to do if they receive an allegation of improper action by an NRC staff member or contractor?

## 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.
- Locate and review the material specifically listed in the reference section of this activity. Although the agency has a code of ethics for employee conduct, not all offices have specific guidance in this area. You should closely review the guidance applicable to your position. Some of this guidance may be in directives which describe the duties and responsibilities of specific positions.
- Meet with your designated ethics expert and discuss applications of ethics to your role as an NRC employee. Demonstrate your understanding of the guidance by explaining how you would address the first three items listed in the evaluation criteria section of this activity.
- Meet with your immediate supervisor or your 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 immediate supervisor.

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

## (ISA-3) Safety Culture

### PURPOSE:

The purpose of this activity is to familiarize you with the NRC's safety culture policy statement so that you can effectively communicate to the regulated community the NRC's expectation for regulated entities to establish and maintain a positive safety culture commensurate with the safety and security significance of their activities and the nature and complexity of their organizations and functions. The agency created several tools (e.g., safety culture Website, safety culture brochure, and case studies) that you should use for providing education and awareness of safety culture to the licensees. You should share key messages from the safety culture policy statement, Website, brochure, and case studies with licensees at inspection entrance or exit meetings.

COMPETENCY AREA: SELF-MANAGEMENT  
COMMUNICATION

LEVEL OF EFFORT: 4 Hours

### REFERENCES:

- Safety Culture Website: <https://www.nrc.gov/about-nrc/safety-culture.html>
- "Safety Culture Policy Statement" NUREG/BR-500 (ML18137A389) or latest revision
- "Review of the Columbia Space Shuttle Accident," computer-based training found in TMS
- Review of the Safety Culture Case Study User Guide and Educational Material: <https://www.nrc.gov/about-nrc/safety-culture/sc-outreach-edu-materials>
- NUREG-2165, "Safety Culture Common Language"

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's external safety culture activities by successfully addressing the following:

- Discuss what the NRC's expectations are related to licensees implementing a positive safety culture.
- Define safety culture and traits.
- Describe the NRC's nine safety culture traits.
- Discuss the NRC-developed safety culture case studies.

TASKS:

- .Explore information and guidance for the safety culture policy statement, website, brochure, and NRC-developed case studies on the identified websites or in ADAMS.
- Complete the “Review of the Columbia Space Shuttle Accident,” training in TMS.
- Meet with your supervisor or a qualified Safety Culture Assessor to discuss any questions that you may have as a result of this activity and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: Obtain your supervisor or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-3.

## (ISA-4) Agencywide Documents Access and Management System (ADAMS)

### PURPOSE:

ADAMS maintains appropriate NRC unclassified, non-safeguards, official program-related records in a centralized electronic records repository. The NRC's publicly available documents are made available through its external Website and the ADAMS public libraries. This ISA activity will help you become familiar with ADAMS and provide basic knowledge on how to use the system.

COMPETENCY AREA: COMMUNICATION  
INFORMATION TECHNOLOGY  
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 3 Hours

### REFERENCES:

- MD 3.53, NRC Records and Document Management Program

### EVALUATION CRITERIA:

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

- Describe the purpose of ADAMS.
- Discuss how the agency uses ADAMS.
- Discuss why it is important to be familiar and proficient with ADAMS.
- Describe the various search methods available in ADAMS that can be used to find documents.
- Describe the information needed to appropriately profile documents in ADAMS using NRC Form 665.

### TASKS:

- Complete the NRC Records Management Training and the ADAMS Basic Training - ADAMS Overview courses available in TMS and review the references included with the training.
- Review MD 3.53, NRC Records and Document Management Program to gain an understanding of the Agency's document management requirements.

- Meet with your immediate supervisor or the person designated to be your resource for this activity demonstrate how locate documents within ADAMS, including Legacy ADAMS, and how to complete an NRC Form 665, "ADAMS Document Submission." Be sure to understand what information needs to be included on the form and how to appropriately determine the document availability.
- Meet with your immediate 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 or designee's signature in the line item for Qualification Journal Certification Signature Card Item ISA-4.

## (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 interact effectively with individuals bringing concerns to the NRC and to respond appropriately to those concerns.

COMPETENCY AREAS: INSPECTION  
SELF-MANAGEMENT  
COMMUNICATION

LEVEL OF EFFORT: 10 Hours

### REFERENCES:

- MD 8.8, "Management of Allegations"
- Allegation Manual
- NRC Form 613, "Allegation Program Identity Protection Policy" available in the Forms Library
- Allegation Manual, Exhibit 1 Information to be Obtained/Provided During the Initial Contact with the Allegor and Exhibit 1A Sample Allegation Intake Form or equivalent allegation receipt guidance
- 10 CFR 19.20, "Employee Protections"
- NRC Safety Culture Policy Statement (NUREG/BR-0500, Revision 4). See <https://www.nrc.gov/regulations-legislation/nureg-series-publications/brochures-prepared-by-nrc-staff/br0500>
- Web-based training modules on the allegation process that are in TMS
- Office guidance on allegations
- NUREG/BR-0240, "Reporting Safety Concerns to the NRC"
- Office of Chief Nuclear Reactor Inspection Webpage

### EVALUATION CRITERIA:

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

- State the criteria used to evaluate a statement to determine if the information in the statement is a potential allegation.
- State the information required to be obtained during the receipt of a potential allegation and the timeframe for providing the allegation to the Office Allegation Coordinator.
- State the role of the Office Allegation Coordinator (OAC)
- State the purpose of, and the steps taken, to prepare for an Allegation Review Board (ARB) including the briefing sheet.
- State the information that should be provided during an ARB, who is required to attend, and the possible outcomes.
- Discuss the allegation evaluation methods that may be directed by the ARB and the criteria used to determine whether there is sufficient information to close an allegation.
- State the purpose of, and the information needed, to prepare allegation closure documentation.
- Discuss the proper handling of allegation material.
- Discuss the NRC policy for protecting the identity of the Concerned Individual.
- Explain what an Ad-Hoc/Emergency ARB is and when it is used.
- 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 in TMS. There are at least two courses that must be completed. These courses are titled: "Allegations Process" and "Allegations Intake and Routing."
3. Review the applicable 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 closed allegation case files as assigned by your immediate supervisor to:
  - a. Identify how incoming correspondence or information was determined to meet the definition of an allegation and how specific concerns were identified.
  - b. Review the associated ARB briefing sheets, particularly the determination of safety significance and the proposed action plan.
  - c. Review the associated allegation closeout memorandum or closeout letter to understand the rationale and basis for an allegation closeout.

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.
7. 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 ARB meetings as assigned by your supervisor.
9. Working with your immediate supervisor or OAC:
  - a. Simulate receiving an allegation and complete the required documentation to present the concern at an ARB meeting. Include a discussion of safety significance and regulatory requirements or issues.
  - b. Discuss with your immediate supervisor or OAC a proposed plan to resolve the simulated allegation.
  - c. Obtain the inspection or investigation results and compare the results to the original concerns. Discuss with your immediate supervisor or OAC how the inspection results addressed the concerns. Discuss whether the allegation concerns were substantiated and how you would respond to the allegor.
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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-5.

## (ISA-6) The Enforcement Program

### PURPOSE:

The purpose of this activity is to provide you with an overview of the NRC Enforcement Program. This ISA will assist you in learning and understanding (1) the purpose of the Enforcement Program, (2) governing statutes and regulations, (3) the sanctions used in the Enforcement Program, and (4) the methods used in assessing and dispositioning violations. It also will provide you with an understanding of the information and guidance resources available to the staff on the Enforcement Program.

### COMPETENCY AREA: ENFORCEMENT FRAMEWORK

LEVEL OF EFFORT: 17 Hours

### REFERENCES:

- NRC Public Webpage: Enforcement Authority and Regulations <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-authnregs.html>
- NRC Enforcement Policy, <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>
- NRC Enforcement Manual, <https://www.nrc.gov/about-nrc/regulatory/enforcement/guidance.html>
- NRC public webpage: Enforcement Program Overview, <https://www.nrc.gov/about-nrc/regulatory/enforcement/program-overview.html>
- NRC public webpage: Alternative Dispute Resolution in the NRC's Enforcement Program: <https://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>
- 10 CFR 2.202, "Orders"

### 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:

- State the purpose of the NRC Enforcement Policy.
- Describe the legal basis from which the NRC derives its enforcement authority.
- Identify the burden of proof standard that the NRC uses in enforcement proceedings.
- Identify the primary sanctions the NRC uses in the enforcement program.
- State the four factors the NRC considers when assessing the significance of a violation.

- Define a minor violation and state the policy on documenting and correcting these violations.
- Define non-cited violation (NCV) and notice of violation (NOV).
- Define escalated enforcement action.
- Understand how to use the enforcement processes to disposition violations.
- Understand the difference between non-escalated and escalated enforcement processes.
- Understand when a responsible program can issue a choice letter to a licensee for an escalated apparent violation without consulting with the Allegation and Enforcement Branch.
- Describe what pre-decisional enforcement conferences and regulatory conferences are and why, when, and with whom they are conducted.
- Describe the Alternative Dispute Resolution (ADR) Program.
- Discuss the purpose of civil penalties, when the NRC considers issuing them, and how the NRC determines the amount of penalties.
- Recognize the purpose of the Confirmatory Action Letter (CAL) and when it is used.
- Recognize the purpose of the different types of Orders and when they are used.
- Describe how violations are dispositioned.

#### TASKS:

- Locate the Enforcement Web page on the NRC public Website. (Hint: Look under How We Regulate).
- Read the enforcement program overview included on the Enforcement Web page of the NRC external Website.
- Read the enforcement process diagram on the Enforcement Web page of the NRC external Website.
- Explain when a responsible program can issue a choice letter to a licensee for an escalated apparent violation without consulting with the Allegation and Enforcement Branch.
- Locate the enforcement manual on the Enforcement Web page of the NRC external Website (look under Enforcement Guidance) and review the table of contents and appendices.
- Locate the most recent escalated enforcement action for a licensee on the Enforcement Web page of the NRC external Website. Review the transmittal letter and attached NOV.

- Review your office's guidance on implementing the enforcement policy.
- Meet with the enforcement specialist in your office to discuss the current enforcement guidance.
- Attend enforcement panels, pre-decisional enforcement conferences, and ADR sessions as assigned by your immediate supervisor.
- Meet with your immediate 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-6.

## (ISA-7) The Office of Investigations

### PURPOSE:

The purpose of this activity is to familiarize you with the Office of Investigations (OI). As an NRC staff member, you may be assigned to work with OI to provide technical support. This ISA will help you understand the role of OI, its functions, and your responsibilities if you are assigned to assist OI during the conduct of an investigation.

COMPETENCY AREA: REGULATORY FRAMEWORK  
INSPECTION

LEVEL OF EFFORT: 4 Hours

### REFERENCES:

- MD 9.8, "Organization and Functions, Office of Investigations"
- OI Web page on the NRC external Website
- OI Web page on the NRC internal Website

### EVALUATION CRITERIA:

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

- State the function of OI.
- Describe the organizational structure of OI.
- 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."
- Describe the authorities of an OI investigator.

### TASKS:

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

- 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-7.

## (ISA-8) NRC Interagency Agreements

### PURPOSE:

While performing inspection or licensing activities, staff 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 issues, transportation questions, and issues involving security. Conversely, other agencies may identify issues of concern to the NRC. To ensure that the proper regulatory authority addresses these items, the NRC has established agreements, called memoranda of understanding (MOUs), with other Federal or State agencies that outline how these issues should be addressed.

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

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 Hours

### REFERENCES:

- IMC 1007, "Interfacing Activities between Regional Offices of NRC and OSHA"
- MOU between the NRC and the Occupational Safety and Health Administration
- MOU between the NRC and the Department of Justice
- MOU between the NRC and the Department of Transportation
- MOU between the NRC and the Department of Labor
- 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 other Federal or State agencies on matters that are not under the regulatory authority of the NRC.
3. Explain the actions required by an NRC staff member when they identify an occupational health and safety issue. Be able to state where the guidance for these actions is provided.

4. Identify who in your 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. Department of Justice (DOJ)
  - d. Department of Labor (DOL)

**TASKS:**

- Identify where the current NRC MOUs are available in your office. You can find electronic versions of MOUs in the NRC Library <https://www.nrc.gov/about-nrc/regulatory/enforcement/guidance>
- Review the MOUs to develop a general understanding of the agreements between the NRC and OSHA, DOT, DOJ, and DOL. Determine the major services or
- Identify the designated liaison for those agencies and State agencies in your office.
- Meet with your supervisor, an experienced staff member, or the above liaison representative to discuss licensee 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.
- 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-8.

## (ISA-9) Interactions with the Public and the Media

### PURPOSE:

The purpose of this activity is to provide you with an understanding of the importance of communicating with the public and the media in an accurate, clear, and noncomplex manner within the limitations of agency guidance for the release of information to the public. Responsiveness and openness are essential to the agency's ability to fulfill its goal of enhancing openness. This ISA will help you understand NRC procedures, policies, and available resources related to interaction with the public and the media.

COMPETENCY AREAS: COMMUNICATION  
SELF-MANAGEMENT  
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 Hours

### REFERENCES:

- NUREG/BR-0215, "Public Involvement in the Nuclear Regulatory Process"
- NUREG/BR-0224, "Guidelines for Conducting Public Meetings"
- NUREG/BR-0297, "NRC Public Meetings"
- NUREG-1614, "Strategic Plan," Current Revision
- NUREG-1379, "NRC Editorial Style Guide"
- MD 3.4, "Release of Information to the Public"
- MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"
- MD 8.11, "Review Process for 10 CFR 2.206 Petitions"
- MD 12.6, "NRC Controlled Unclassified Information (CUI) Program"
- Plain Language available at: <https://www.nrc.gov/public-involve/open/plain-writing.html>
- Office of Public Affairs (internal website)
- 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)

### EVALUATION CRITERIA:

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

1. Describe the expectations of NRC employees regarding answering telephone calls, emails 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 and 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 they are 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.
10. Discuss the NRC goal of improving public confidence and how good communication with the media contributes to its achievement.
11. Identify the importance of communicating with the media in a manner to build trust.
12. Discuss the importance of agency goals, the agency's safety focus, risk-informed policies, trustworthiness, and limitations on subject knowledge regarding communicating with the media.
13. 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.

#### TASKS:

- Review the information presented by the NRC Office of Public Affairs on interactions with the public that can be found on the NRC internal and external websites. Review the information available on the external NRC website related to general topics of interest to

the public, such as the public involvement, school programs, and technical information papers.

- Visit the NRC Plain Language Action Plan on the internal website, including some of the links to resource materials.
- Identify, locate, and review your office's policy guidance on the staff's receipt and processing of inquiries from the public. Meet with your Public Affairs Officer (PAO) or supervisor and discuss the expectations of an NRC staff member who receives an inquiry.
- 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.
- If possible, attend a public meeting and observe the protocols used in the meeting.
- Meet with a PAO representative and discuss the items listed in the Evaluation Criteria section.
- Review the CUI requirements on the Website or Management Directive and become familiar with the type of information that may not be shared with the public
- 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-9.

## (ISA-10) 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 Freedom of Information Act (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 AREA: COMMUNICATION  
SELF-MANAGEMENT  
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 Hours

### REFERENCES:

- 10 CFR Part 9, "Public Records"
- MD 3.1, "Freedom of Information Act"
- MD 3.2, "Privacy Act"
- MD 3.4, "Release of Information to the Public"
- Office instructions establishing the policy and procedure for processing FOIA requests for agency records
- Information Security Website – Privacy Act/Personally Identifiable Information (PII): <https://usnrc.sharepoint.com/sites/SUNSI>
- FOIA Training for Federal Employees (web-based training course in TMS)

### 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, pre-decisional, 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.
7. Discuss the possible consequences associated with maintaining unnecessary electronic or paper copies of licensee documents following completion of an inspection activity.

#### TASKS:

- Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.
- Explore the information made available to the public on the NRC Website and within ADAMS.
- Review the agency guidance on how to implement FOIA without releasing pre-decisional information and other information covered under the Privacy Act.
- Complete the on-line course "FOIA Training for Federal Employees" located in TMS.
- 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-10.

## (ISA-11) Generic Communications

### PURPOSE:

The purpose of this 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 AREA: REGULATORY FRAMEWORK

### LEVEL OF EFFORT: 6 Hours

### REFERENCES:

- Generic Communications Program Web page at <http://www.nrc.gov/about-nrc/regulatory/gencomms.html>
- IMC 0730, "Generic Communications Regarding Materials and Fuel Cycle Issues"
- MD 8.18, "NRC Generic Communications Program"

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of different types of NRC generic communications and the purposes of each type by successfully completing the following:

- Describe the different kinds of generic communications and their purposes.
- Describe what can and cannot be required in the specific types of generic communications.

### TASKS:

- Review the references to understand the principles discussed in the evaluation criteria.
- Identify with your immediate supervisor and review a selection Bulletins, Generic Letters, Information Notices (INs) and Regulatory Issue Summaries (RISs) pertinent to your position.
- 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-11.

## (ISA-12) Open, Collaborative Working Environment & 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 AREA: INSPECTION  
SELF-MANAGEMENT  
COMMUNICATION

LEVEL OF EFFORT: 3 Hours

### REFERENCES:

- NCP website: <https://usnrc.sharepoint.com/teams/NRC-Non-Concurrence-Process>
- DPO Program website: <https://usnrc.sharepoint.com/teams/NRC-Differing-Professional-Opinions>
- MD 10.160, "Open Door Policy"
- MD 10.158, "NRC Differing Views Program"
- "Implementation Guidance for NRC's Differing Views Program"
- 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:

- Describe the Open - Door Policy.
- Describe the key features of the NCP.
- Describe the key features of the DPO Program.
- Discuss under what circumstances the various methods available for expressing differing views could be used.
- Describe the type of information available on the NCP and DPO Program Website.

## TASKS:

- Explore information and guidance for Open Door Policy, NCP, and DPO Program on identified Websites.
- Review MD 10.160, MD 10.158, and the “Implementation Guidance for NRC’s Differing Views Program”
- 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 or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-12.

## (ISA-13) Overview of 10 CFR Parts 19 and 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. This ISA 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 staff will use when conducting inspections in radiologically controlled areas.

### COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 5 Hours

### REFERENCES:

- Paper or electronic copy of 10 CFR 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 by successfully completing the following:

- 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.
- Identify the section of 10 CFR Part 19 that requires a licensee to report doses to workers.
- Describe the purpose of 10 CFR Part 20.
- Identify the relevant section of 10 CFR Part 20 and discuss the various radiological circumstances that would require a licensee to notify the NRC.
- Discuss why it is important to have a general understanding of 10 CFR Part 19 and 10 CFR Part 20.

### TASKS:

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)
  - c. Requirements for instruction to workers (19.12)
  - d. Requirements to provide individuals radiation exposure data (19.13)
  - e. Interactions with the licensee and workers during an inspection (19.14 and 19.15)
  - f. Requests by workers for an NRC inspection (19.16)
2. Review 10 CFR Part 20 for a general understanding of the following:
- a. The purpose of 10 CFR Part 20 (20.1001)
  - b. Concepts of as low as reasonably achievable (ALARA) (20.1101)
  - c. Occupational dose limits for adults (20.1201)
  - d. Radiation dose limits for member of the public (Subpart D)
  - e. Conducting surveys (20.1501)
  - f. Conditions requiring individual monitoring of external and internal occupational dose (20.1502)
  - g. Control of access to high radiation area (20.1601)
  - h. Control of very high radiation area (20.1602)
  - i. Storage and control of licensed material (Subpart I)
  - j. Posting requirements (20.1902)
  - k. Labeling containers (20.1904)
  - l. Exemptions to labeling requirements (20.1905)
  - m. Requirements for receiving and opening packages (20.1906)
  - n. Waste disposal (Subpart K)
  - o. Reporting requirements (Subpart M)
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 or designee's signature in the line item for Basic Level Certification Signature Card Item ISA-13.

## (ISA-14) Overview of Select Parts of 10 CFR

### PURPOSE:

The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the NRC. This ISA will help you to understand the regulations and become familiar with specific requirements in the regulations.

### COMPETENCY AREA: REGULATORY FRAMEWORK

### LEVEL OF EFFORT: 5 Hours

### REFERENCES:

- Paper or electronic copy of 10 CFR Parts 1 through 199

### EVALUATION CRITERIA:

Identify with your immediate supervisor what parts of the regulations you should focus on during your review. Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of the general content of 10 CFR by successfully discussing the following:

- State the purpose of 10 CFR Parts 2, 21, 40, 70, 71, 73, 74, 110, 150, 170, and 171.
- Given a specific subject, identify which section in 10 CFR discusses the requirements for that subject.

### TASKS:

1. Review 10 CFR Part 2 for a general understanding of the following:
  - a. Scope (2.1)
  - b. Notice of violation (2.201)
  - c. Scope of adjudicatory hearings (2.300)
  - d. Public inspections, exemptions, requests for withholding (2.390)
  - e. Rulemaking (2.800, 2.802)
2. Review 10 CFR Part 21 for a general understanding of the following:
  - a. Scope (21.2)
  - b. Notification (21.21(d))

3. Review 10 CFR Part 40 for a general understanding of the following:
  - a. Purpose (40.1)
  - b. Unimportant quantities (40.13)
  - c. Reporting requirements (40.60)
  - d. Certain items containing source material (40.52)
4. Review 10 CFR Part 50 for a general understanding of the following:
  - a. Basis, purpose, and procedures applicable (50.1)
  - b. Class 104 licenses (50.21)
  - c. Class 103 licenses (50.22)
5. Review 10 CFR Part 70 for a general understanding of the following:
  - a. Purpose (70.1)
  - b. Calibration or reference sources (70.19)
  - c. Reporting requirements (70.50)
6. Review 10 CFR Part 71 for a general understanding of the following:
  - a. Purpose and scope (71.0)
  - b. Transportation of licensed material (71.5)
7. Review 10 CFR Part 73 for a general understanding of the following:
  - a. Purpose and scope (73.1)
  - b. Exemptions for certain quantities and kinds of special nuclear material (73.6)
8. Review 10 CFR Part 74 for a general understanding of the following:
  - a. Purpose (74.1)
  - b. Scope (74.2)
  - c. Physical inventory summary report (74.17)
9. Review 10 CFR Part 110 for a general understanding of the following:
  - a. Purpose and scope (110.1)
  - b. General license for export (110.22 and 110.23)
  - c. General license for import (110.27)

10. Review 10 CFR Part 150 for a general understanding of the following:
  - a. Purpose (150.1)
  - b. Persons in offshore waters (150.7)
  - c. Recognition of Agreement State licenses (150.20)
11. Review 10 CFR Part 170 and 171 for a general understanding of the fees that licensees pay for application (170.31) and annually (171.16).
12. Meet with your immediate 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 or designee's signature in the line item for Qualification Journal Certification Signature Card Item ISA-14.

## (ISA-15) Significant Events at Licensed Facilities

### PURPOSE:

This ISA will help you become familiar with how the NRC handles events related to radioactive material at licensed facilities to include offsite licensed material events. You may be assigned to either a special inspection team (SIT), augmented inspection team (AIT), or an incident investigation team (IIT) inspection activity. This ISA 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 a SIT, AIT, and IIT. You will also become familiar with the NRC's Nuclear Material Events Database (NMED) and the information in the system.

### COMPETENCY AREA: INSPECTION

### LEVEL OF EFFORT: 12 Hours

### REFERENCES:

- NMED Website: <http://nmed.inl.gov/>
- MD 8.1, "Abnormal Occurrence Reporting Procedure"
- MD 8.3, "NRC Incident Investigation Program"
- MD 8.10, "NRC Medical Event Assessment Program"
- NMED Annual Reports (Hint: Use the drop-down menu on the NMED Website to access reports)
- IP 93800, "Augmented Inspection Team"
- IP 93812, "Special Inspection"
- IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan"

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of how the NRC handles events (SIT, AIT, and IIT inspections) and what information is stored in NMED by successfully discussing the following:

- Discuss the historical events reviewed, as well as the recommendations made, lessons learned, and the changes identified to prevent recurrences.
- Describe the role of an NRC staff when responding to events.

- If applicable, discuss the information stored in NMED and how the NRC uses it. In addition, describe the information included in the NMED Annual Reports.
- Describe the information included in the Abnormal Occurrence Annual Reports.
- State the purpose of the NRC Incident Investigation Program.
- Describe an SIT and its purpose, including how the agency determines if one is required and who will staff the team.
- Describe an AIT and its purpose, including how the agency determines if one is required and who will staff the team.
- Describe an IIT and its purpose, including how the agency determines if one is required and who will staff the team.
- Describe how the Incident Investigation Program is different from the Incident Response Program.

#### TASKS:

- Obtain an NMED login and password by following the instructions at: <http://nmed.inl.gov/>
- Review the historical events, recommendations made, lessons learned, and changes identified to prevent recurrence as identified by your immediate supervisor or person designated to be your resource for this activity.
- If applicable, review the most recent Abnormal Occurrence Report and NMED Annual Report.
- Review MD 8.3, which can be found on the NRC internal website.
- Review your office's guidance on AIT, SIT, and IIT activities.
- Discuss with your immediate supervisor or person designated to be your resource for this activity the responsibility of an NRC staff member when responding to events.
- Meet with your immediate 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 or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-15.

## (ISA-16) The NRC's Response to an Emergency at a Nuclear Facility

### PURPOSE:

The purpose of this activity is to acquaint you with the actions that the NRC takes in response to an emergency that may occur at a nuclear facility. Emergency response is vital to the agency, fulfilling one of its primary mandates of protecting the health and safety of the public. As a fully qualified license reviewer or inspector, you will be trained to perform specific emergency response activities. This individual study activity will help you understand how the NRC meets its emergency response mandate and will begin to build the knowledge you will need later to successfully perform your assigned emergency response responsibilities.

### COMPETENCY AREA: EMERGENCY RESPONSE

LEVEL OF EFFORT: 8 Hours

### REFERENCES:

- NRC internal Web page
- MD 8.2, "NRC Incident Response Program"
- MD 6.2, "Continuity of Operations Program"
- Incident Response Manual Chapter 200, "Incident Response Plan" (non-public) (ML23146A116)
- Inspection Procedure (IP) 71153 Attachment 2, "Limiting NRC Impact During Events"
- Incident Response Awareness Training (web based) course located in TMS.
- IRP: General Response Training (GRT) (web based) course located in TMS.
- Office specific policy/guidance for incident response.

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC incident response program by successfully doing the following:

1. Describe the purpose of the NRC's incident response program.
2. Identify the types of emergency classifications for a given facility (reactor, fuel facility, materials facility, etc.) and give examples of when the different classifications would be declared.
3. Identify the different modes of NRC emergency response and describe the purpose of each mode.

4. Review the response organization and describe the roles and responsibilities of the following:
  - a. Response Director
  - b. Operations Section (including the roles of the Reactor Safety Group, Protective Measures Group, and Security Group)
  - c. Planning Section
  - d. Logistics Section
  - e. Liaison Officer
  - f. Public Information Officer
  - g. Headquarters Operations Officer
5. If you are onsite when an emergency is declared, explain the difference in your actions if there are resident inspectors onsite or if there are no other inspectors onsite. Describe the protocol for limiting unnecessary impact on licensee activities during an event.

**TASKS:**

- Review IRMC 200 to gain an understanding of the NRC's incident response program, including the purpose of the incident response program, the response modes, and the response organization.
- Complete the Incident Response Awareness Training and IRP: General Response Training available in TMS.
- Meet with the Incident Response Coordinator in your office, take a tour of the Incident Response Center or Headquarters Operations Center and if possible, observe the NRC's response during a drill or event.
- Meet with your immediate 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 or designee's signature in the line item for Qualification Journal Certification Signature Card Item ISA-16.

## (ISA-17) Use of Risk Information in Regulatory Activities

### PURPOSE:

The purpose of this activity is to familiarize you with the NRC's processes and strategies for risk assessment so that you can effectively communicate and understand how the NRC ensures U.S. nuclear power plants and other licensed facilities operate with minimal risk to public health and safety, and how the NRC integrates risk into the decision-making process. The agency created the Be riskSMART framework to ensure decisions are risk informed.

COMPETENCY AREA: REGALATORY FRAMEWORK  
CRITICAL THINKING

LEVEL OF EFFORT: 8 Hours

### REFERENCES:

- On-line NRC training course: "Be riskSMART: A Tool for Everyone"
- Be riskSMART Nuclepedia page:  
[https://nuclepedia.usalearning.gov/index.php/Be\\_riskSMART](https://nuclepedia.usalearning.gov/index.php/Be_riskSMART)
- Implementing Be RiskSMART in NMSS internal SharePoint:  
<https://usnrc.sharepoint.com/sites/nmss-hub/SitePages/Be-RiskSMART.aspx>
- Historical Review and Observations of Defense-in-Depth (NUREG/KM-0009), with a focus on your topic area
- NUREG/KM-0016, Guidance for Integrating Risk Insights into NRC Decisions (Be riskSMART)
- NRC Policy Statement, Use of Probabilistic Risk Assessment Methods in Nuclear Regulatory Activities (Section IV – skim remainder) (60 FR 42622):  
<https://www.nrc.gov/reading-rm/doc-collections/commission/policy/60fr42622.pdf>
- SECY-98-144, "White Paper on Risk-Informed and Performance-Based Regulation – skim Risk-Informed Initiatives
- Fact Sheet, "Probabilistic Risk Assessment" – (first two pages only):  
<https://www.nrc.gov/reading-rm/doc-collections/fact-sheets/probabilistic-risk-asses.html>
- "Risk Assessment in Regulation" public website, including the "Risk-Informed Activities" subsection: <https://www.nrc.gov/about-nrc/regulatory/risk-informed.html>
- NUREG/BR-0308, "Effective Risk Communication"

- NUREG/BR-0318, “Effective Risk Communication: The Nuclear Regulatory Commission’s Guidelines for Internal Risk Communication” NUREG brochures NUREG/BR 0318)
- Moments in NRC History: The Birth, Death, and Rebirth of Probabilistic Risk Assessment, 8 min: <https://www.youtube.com/user/NRCgov>
- Moments in NRC History: Safe Enough? The Rise of Risk-Informed Regulations videos, 8.5 min: <https://www.youtube.com/user/NRCgov>

#### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC incident response program by successfully doing the following:

- Discuss the NRC’s Policy Statement to incorporate risk assessment in regulatory activities.
- Define risk and the risk triplet.
- Discuss the philosophy of risk-informed regulation and NRC’s Defense in Depth.
- Explain the difference between risk-based and risk-informed.
- Discuss the NRC use of qualitative and quantitative risk assessment in decision making. Provide examples in your area to the extent possible.
- Explain how and why both deterministic and probabilistic approaches are used in risk-informed regulation.
- Describe specific risk assessment guidance and tools (e.g. methodologies, software programs, applications, etc). used by your program/position/focus area/business line.
- Describe the Be riskSMART decision making framework and give examples of when it should be used – especially in your area.
- Discuss considerations in communicating about risk with external stakeholders.

#### TASKS:

- Watch the videos in reference list.
- Complete or review, Be riskSMART: A Tool for Everyone in the agency on-line learning application.
- Review the reference material to gain an understanding of the principles discussed in the evaluation criteria. Note: some of the information needed to understand the evaluation criteria may not be directly in the reference material and may require discussion with knowledgeable staff.

DOCUMENTATION: Obtain your supervisor or designee's signature in the line item for Qualification Journal Certification Signature Card Item ISA-17.

## BASIC LEVEL ON-THE-JOB ACTIVITIES

The OJT activities are designed to allow you to observe and perform key knowledge-based tasks. Like the ISAs, each OJT activity describes why the activity is important and what you are expected to successfully complete during the activity.

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

- Complete all assigned parts of each activity.
- Your immediate supervisor or a designated fully qualified staff member will act as a source 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.
- You are responsible for keeping track of the tasks you have completed. Be sure that you have completed all aspects of an OJT activity before you meet with your immediate supervisor or designated fully qualified staff member for evaluation.

## Basic Level On-The-Job Activities

(OJT-1) Familiarization with Inspections or Site Visits  
(for materials inspectors and reviewers)

PURPOSE:

The purpose of this activity is to (1) acquaint you with the different types of materials users and types of use of radioactive material, (2) gain an understanding of the preparation for inspection activities, (3) observe qualified inspectors conduct inspections or site visits, (4) familiarize you with the documentation of inspection results or site summary memo, and (5) if applicable, observe the enforcement process.

COMPETENCY AREA: INSPECTION  
REGULATORY FRAMEWORK  
INFORMATION TECHNOLOGY

LEVEL OF EFFORT: 60 Hours

REFERENCES:

- Radioactive materials license
- Appropriate IMCs and Inspection Procedures
- Previous inspection report or site status summary

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:

- Identify the types of licenses inspected.
- Discuss the documents to be reviewed, including their content and purpose, before an inspection or site visit.
- Describe how the inspector used the reference documents to conduct the inspection.
- Discuss the different parts of the inspection, including the entrance and exit meeting, and the elements involved for each part (level of management, topics discussed, timing).
- Explain any potential violations that were cited by the inspector. Explain why the licensee was cited.

TASKS:

- As assigned by your immediate supervisor, accompany and assist a qualified inspector with the performance of a variety of health and safety inspections or site visits; your

immediate supervisor will determine the actual number and type of inspections or site visits. You are responsible for keeping track of the inspections or site visits that you accompanied.

- Assist in the inspection or site visit preparation activities (i.e., collect background information as necessary; identify any follow-up that may be required from previous inspections, or allegations).
- If applicable, review NMED for any recent events involving the licensee as well as any potential generic issues and open items.
- Locate and review the IPs that will be used during the inspection or site visit.
- Become familiar with the scope of the inspection or site visit.
- Participate in the entrance (visit introduction) and exit meeting (visit summary) with the licensee.
- Participate in the interviews of the applicant's or licensee's personnel.
- Become familiar with the documentation of inspection results discussed in IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports."
- Assist the inspector or project manager in developing the inspection report or site visit summary memo following the appropriate IMC. Help draft any violations identified during the inspections, or if one was not identified, draft one using an example from a previous inspection.
- Meet with your immediate 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 immediate supervisor or designee's signature in the line item for Basic-Level Certification Signature Card Item OJT-1.

(OJT-1a) Inspection Accompaniment (for risk analysts, project managers, or technical reviewers in decommissioning, uranium recovery, or waste programs)

PURPOSE:

The purpose of this activity is to participate and assist with some inspection tasks commonly performed by an inspector at different types of facilities that may undergo decommissioning; and provide the opportunity use licensing documents to identify appropriate activities for inspections at these sites.

COMPETENCY AREA:   INSPECTION  
                              COMMUNICATION  
                              REGULATORY FRAMEWORK  
                              INFORMATION TECHNOLOGY  
                              TEAMWORK

LEVEL OF EFFORT:     60 Hours

REFERENCES:

- Licensee's documents (especially recent license amendments that have approved DPs, TS, and final safety analysis report (FSAR), LTPs and changes to the TS and FSAR)
- IMC 0111, "Region I Monitoring Activities for the DOE West Valley Demonstration Project," (as applicable)
- IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"
- IMC 0615, "Research and Test Reactor Inspection Reports"
- IMC 2545, "Research and Test Reactor Inspection Program"
- IMC 2561, "Decommissioning Power Reactor Inspection Program" and associated IPs listed in Appendixes A and B of IMC 2561
- IMC 2602, "Decommissioning Oversight and Inspection Program for Fuel Cycle Facilities and Materials Licensees"
- IMC 2800, "Materials Inspection Program"
- IMC 2801, "Uranium Mill 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program"
- IP 69013, "Research and Test Reactor Decommissioning"
- Previous inspection reports
- Regulatory guidance documents as applicable

- Recent Enforcement Actions/Allegation history (~two years)

#### 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. Understand the inspection process.
2. Describe the contents and purpose of the site-specific inspection plan.
3. Describe how the inspector used the reference documents to conduct or support the inspection.
4. Describe how the inspector determined what licensee activities would be inspected.
5. Describe the purpose of the following inspection activities:
  - a. Entrance meeting.
  - b. Management briefing and exit pre-briefing of licensee management.
  - c. Exit meeting.
6. Discuss how the inspection will be documented.

#### TASKS:

1. For a facility chosen by your supervisor, familiarize yourself with the recent inspections conducted at the facility and the resultant inspection reports.
2. Familiarize yourself with the applicable in-house software for planning inspections such as Reactor Program System and/or Web Based Licensing.
3. Participate in an inspection planning call with the licensee as appropriate.
4. Determine whether there are any open allegations for your site and whether the subject matter affects the inspection. Discuss with the allegation coordinator as necessary.
5. Arrange for site access (as applicable).
6. Identify which licensee documents will be necessary for the inspection and submit a document request (as applicable).
7. Locate the radiation instrument storage location and learn the process of checking an instrument out.
8. Familiarize yourself with the process to prepare for an inspection that requires the inspector to gather samples and ship them offsite for analysis.
9. Write an inspection plan at the discretion of the lead inspector. This could be a master inspection plan, a plan for a single inspection.

10. Assist the lead inspector in developing the inspection documentation in accordance with the applicable IMC.
11. During inspection observations, perform the following tasks:
  - a. Implement IPs.
  - b. Participate in entrance and exit meetings and any exit pre-briefings of licensee management.
  - c. Participate in interviews and discussion with facility personnel.
  - d. Observe facility work activities.
  - e. Review documentation and records.
  - f. Discuss inspection results with the lead inspector.
12. Perform the following tasks in at least one inspection:
  - a. Draft a portion of the inspection-specific plan.
  - b. Conduct activities described in Tasks 1 and 2 above, as appropriate.
  - c. Conduct a portion of the following:
  - d. Entrance meeting.
  - e. Briefing of NRC management.
  - f. Pre-briefing of licensee management.
  - g. Exit meeting.
13. Assist in one or more of the following inspection activities, as directed by your immediate supervisor and the lead inspector:
  - a. IP 37801, "Safety Reviews, Design Changes, and Modifications at Permanently Shutdown Reactors"
  - b. IP 40801, "Problem Identification and Resolution at Permanently Shutdown Reactors"
  - c. IP 60801, "Spent Fuel Pool Maintenance, Surveillance, and Safety at Permanently Shutdown Reactors"
  - d. IP 64704, "Fire Protection Program at Permanently Shutdown Reactors"
  - e. IP 71801, "Decommissioning Performance and Status Reviews at Permanently Shutdown Reactors"
  - f. IP 83750, "Occupational Radiation Exposure"
  - g. IP 83801, "Inspection of Remedial and Final Surveys at Permanently Shut down Reactors"

- h. IP 84750, "Radioactive Waste Treatment, and Effluent and Environmental Monitoring"
- i. IP 86750, "Solid Radioactive Waste Management and Transportation of Radioactive Materials"
- j. A combination of the above IPs at a SAFSTOR site.
- k. IP 87104, "Decommissioning Inspection Procedure for Materials Licensees"
- l. IP 87654, "Decommissioning Inspection Procedure for Uranium Recovery"
- m. IP 83890, "Closeout Inspection and Survey"
- n. IP 88104, "Decommissioning Inspection Procedure for Fuel Cycle Facilities"
- o. IP 89060, "Department of Energy Legacy Management Site Review"

DOCUMENTATION: Obtain your immediate supervisor or designee's signature in the line item for Basic-Level Certification Signature Card Item OJT-1a.

## (OJT-2) Briefings

### PURPOSE:

The purpose of this activity is to acquaint you with a variety of briefings, including internal NRC management and external stakeholders.

COMPETENCY AREA: INSPECTION  
REGULATORY FRAMEWORK  
INFORMATION TECHNOLOGY

LEVEL OF EFFORT: 10 hours

### REFERENCES:

- NRC Communications Hub (<https://usnrc.sharepoint.com/teams/Communications-Hub/SitePages/Resources.aspx>)
- NRC Writing Class (<https://usnrc.sharepoint.com/teams/Writing-Class>)
- OEDO Procedure 0520, "Individual Commissioner Briefings" (ML070100320)
- IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"

### EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the briefings with internal and external stakeholders by successfully doing the following:

- Explain the NRC's Plain Language guidance and how the NRC staff use this guidance when communicating with internal and external stakeholders.
- Explain the difference between active and passive voice in written communications and when each should be used.
- Describe the concept of Bottom Line Up Front (BLUF), and how it can be used to improve written and verbal communications.
- Describe how to prepare for a briefing, including how a staff member determines the level of detail and format for how the information is shared (for example, presentation slides or talking points).
- IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"

### TASKS:

- Review the guidance on the NRC Communication Hub to gain an understanding of the NRC's Plain Language program, Editorial Style Guide, and/or Risk Communications to

gain an understanding of how the NRC communicates with internal and external stakeholders.

- Review the guidance on the NRC Writing Class to gain an understanding of how written communications should be prepared.
- Participate in branch level briefings with technical staff to gain an understanding of how information is shared.
- Prepare for and give a management briefing at the Division Director level or higher on a technical topic. Work with your mentor or supervisor to prepare for the briefing.
- For inspectors, observe an entrance and exit meeting. If possible, conduct a mock entrance and exit meeting using a recently completed inspection in the presence of you supervisor or a qualified inspector.
- Meet with your immediate 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 immediate supervisor or designee's signature in the line item for Basic-Level Certification Signature Card Item OJT-2.

Form 1: Basic Qualification Signature Cards and Certification

|                                                                                  |                           |                              |
|----------------------------------------------------------------------------------|---------------------------|------------------------------|
| Employee Name:                                                                   | Employee<br>Initials/Date | Supervisor<br>Signature/Date |
| <b>A. Required Training</b>                                                      |                           |                              |
| Training: Site Access Training (H-100) or Site Access Refresher Training (H-101) |                           |                              |
| Occupational Health and Safety (IMC-1248)                                        |                           |                              |
| Ethics Training for New Employees                                                |                           |                              |
| Allegation Process                                                               |                           |                              |
| The Non-Concurrence Process (NCP)                                                |                           |                              |
| Differing Professional Opinion (DPO)                                             |                           |                              |
| <b>B. Interpersonal Skills Training Courses</b>                                  |                           |                              |
| Effective Communications for NRC Inspectors                                      |                           |                              |
| Gathering Information for Inspectors through Interviews                          |                           |                              |
| Media Training Workshop                                                          |                           |                              |
| <b>C. Individual Study Activities</b>                                            |                           |                              |
| ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission         |                           |                              |
| ISA-2 Objectivity, Protocol, and Professional Conduct                            |                           |                              |
| ISA-3 Safety Culture                                                             |                           |                              |
| ISA-4 Agencywide Documents Access and Management System (ADAMS)                  |                           |                              |
| ISA-5 Allegations                                                                |                           |                              |
| ISA-6 The Enforcement Program                                                    |                           |                              |
| ISA-7 The Office of Investigations                                               |                           |                              |
| ISA-8 NRC Interagency Agreements                                                 |                           |                              |
| ISA-9 Interactions with the Public and the Media                                 |                           |                              |
| ISA-10 The Freedom of Information Act and the Privacy Act                        |                           |                              |
| ISA-11 Generic Communications                                                    |                           |                              |
| ISA-12 Open, Collaborative Working Environment & Ways to Raise Differing Views   |                           |                              |
| ISA-13 Overview of 10 CFR Parts 19 and 20                                        |                           |                              |
| ISA-14 Overview of Select Parts of 10 CFR                                        |                           |                              |
| ISA-15 Significant Events at Material Licensees                                  |                           |                              |
| ISA-16 The NRC's Response to an Emergency at a Nuclear Facility                  |                           |                              |
| ISA-17 Use of Risk Information in Regulatory Activities                          |                           |                              |

|                                                                                              |  |  |
|----------------------------------------------------------------------------------------------|--|--|
| D. On the Job Training Activity                                                              |  |  |
| OJT-1 Familiarization with Inspections or Site Visits for materials inspectors and reviewers |  |  |
| OJT-1a Inspection Accompaniment for decommissioning, uranium recovery, and waste programs    |  |  |
| OJT-2 Briefings                                                                              |  |  |

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

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

Form 1: Basic Qualification Equivalency Justification

|                                                                                |                                                                              |
|--------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| Employee Name:                                                                 | Identify equivalent training and experience for which credit is being given: |
| <b>A. Required Training</b>                                                    |                                                                              |
| Site Access Training (H-100) or Site Access Refresher Training (H-101)         |                                                                              |
| Occupational Health and Safety (IMC-1248)                                      |                                                                              |
| Ethics Training for New Employees                                              |                                                                              |
| Allegation Process                                                             |                                                                              |
| The Non-Concurrence Process (NCP)                                              |                                                                              |
| Differing Professional Opinion (DPO)                                           |                                                                              |
| <b>B. Interpersonal Skills Training Courses</b>                                |                                                                              |
| Effective Communications for NRC Inspectors                                    |                                                                              |
| Gathering Information for Inspectors through Interviews                        |                                                                              |
| Media Training Workshop                                                        |                                                                              |
| <b>C. Individual Study Activities</b>                                          |                                                                              |
| ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission       |                                                                              |
| ISA-2 Objectivity, Protocol, and Professional Conduct                          |                                                                              |
| ISA-3 Safety Culture                                                           |                                                                              |
| ISA-4 Agencywide Documents Access and Management System (ADAMS)                |                                                                              |
| ISA-5 Allegations                                                              |                                                                              |
| ISA-6 The Enforcement Program                                                  |                                                                              |
| ISA-7 The Office of Investigations                                             |                                                                              |
| ISA-8 NRC Interagency Agreements                                               |                                                                              |
| ISA-9 Interactions with the Public and the Media                               |                                                                              |
| ISA-10 The Freedom of Information Act and the Privacy Act                      |                                                                              |
| ISA-11 Generic Communications                                                  |                                                                              |
| ISA-12 Open, Collaborative Working Environment & Ways to Raise Differing Views |                                                                              |
| ISA-13 Overview of 10 CFR Parts 19 and 20                                      |                                                                              |
| ISA-14 Overview of Select Parts of 10 CFR                                      |                                                                              |

|                                                                                              |  |
|----------------------------------------------------------------------------------------------|--|
| ISA-15 Significant Events at Material Licensees                                              |  |
| ISA-16 The NRC's Response to an Emergency at a Nuclear Facility                              |  |
| ISA-17 Use of Risk Information in Regulatory Activities                                      |  |
| D. On the Job Training Activities                                                            |  |
| OJT-1 Familiarization with Inspections or Site Visits for materials inspectors and reviewers |  |
| OJT-1a Inspection Accompaniment for decommissioning, uranium recovery, and waste programs    |  |
| OJT-2 Briefings                                                                              |  |

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

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

Attachment 1: Revision History for MC 1248 Appendix J

| Commitment Tracking Number | Accession Number<br>Issue Date<br>Change Notice | Description of Change | Description of Training Required and Completion Date | Comment Resolution and Closed Feedback Form Accession Number<br>(Pre-Decisional Non-Public Information) |
|----------------------------|-------------------------------------------------|-----------------------|------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
|                            | ML26077A175<br>10/14/26<br>CN 26-047            | New issuance.         | N/A                                                  | ML26077A180                                                                                             |