

NRC INSPECTION MANUAL NMSS

MANUAL CHAPTER 1246

FORMAL QUALIFICATION PROGRAMS IN THE NUCLEAR MATERIAL SAFETY AND SAFEGUARDS PROGRAM AREA

1246-01 PURPOSE

01.01 To define training and qualification requirements for personnel in the Nuclear Material Safety and Safeguards (NMSS) program area. Initial qualification is achieved through self-study, formal classroom, and on-the-job training.

01.02 To define additional training to maintain and enhance the effectiveness of experienced personnel in identified specialty areas.

1246-02 OBJECTIVES

02.01 To ensure that NMSS program area personnel meet minimum knowledge and qualification standards.

02.02 To provide a standardized methodology for determining that NMSS program area inspectors or license reviewers or project manager/technical reviewers have met the established qualification requirements.

1246-03 POLICY

NMSS program area personnel must understand the facilities, equipment, processes, and activities of the programs they inspect or license, as well as the criteria, techniques, and mechanics of inspection and licensing. The qualification process is intended to provide inspectors, license reviewers, and project manager/technical reviewers with sufficient information to conduct inspections and license reviews that are technically correct and in accordance with NRC regulations, policies and procedures.

Personnel assigned as inspectors, license reviewers, and project manager/technical reviewers in the NMSS program area must successfully complete the requirements for their individual inspection or licensing areas, as listed in each section of Appendix A and the appropriate Qualification Journal described in each section of Appendix B. Individuals who inspect facilities being decommissioned must qualify as a Decommissioning Inspector in accordance with Section IX if performing Type 3 and 4 decommissioning activities (As defined in NUREG/BR-0241). Type 1 and 2 decommissioning activities (As defined in NUREG/BR-0241) may be performed by individuals qualified as Materials Health Physics Inspectors in accordance with Section II as

approved by the individual's supervisor. In addition to the formal requirements of this document, other training may be necessary to supplement or enhance inspector, license reviewer, or project manager/technical reviewers development. Exemption from specific training topics may be granted in accordance with Section 1246-11 of this chapter.

The appropriate Qualification Journal described in Appendix B specifies the minimum inspector, reviewer, or project manager/technical reviewer qualification requirements. Regions and Headquarters Offices may customize specific Qualification Journals to add other requirements as appropriate.

Upon completion of the training identified in the Qualification Journal, the inspector's, license reviewer's, or project manager/technical reviewer's understanding of the material will be evaluated by an oral qualification board (Board). Boards for this purpose will be convened using the guidance in Section 1246-08.

Inspectors, license reviewers, or project manager/technical reviewers undergoing qualification may perform inspections or license application reviews under the direction of a qualified inspector, license reviewer, or project manager/technical reviewer. In situations where qualification is delayed as a result of the unavailability of required formal training courses, or for other compelling reasons, the Regional Administrator (or designee) or Office Director (or designee) may provide interim license reviewer, project manager/technical reviewer, or inspector qualification under the provisions of Section 1246-09 for those categories in which the inspector, license reviewer, or project manager/technical reviewer is considered qualified. Interim license reviewer or project manager/technical reviewer qualification includes license signature authority for select license categories in accordance with a written delegation.

An individual who changes disciplines must meet or complete the training and qualification requirements for the new discipline. In such cases, previous equivalent training requirements in common between the two disciplines need not be repeated, and credit for the previous similar training will be indicated in the current qualification journal. An oral qualification board will be utilized unless waived in accordance with the provision of Section 1246-11.

Special circumstances (e.g., budget reductions, delays in establishing replacement contracts, or unavailability of critical instructors) may result in the temporary unavailability of courses required for formal qualification. In this case, the Associate Director for Training and Development (ADTD), HR, will communicate with the cognizant NMSS program area division directors explaining the situation. This does not remove the need for the qualifying employee to attend the required course. It is expected that employee schedules will be adjusted as necessary to allow and require the employee to attend the required training when it is made available.

Temporary Instructions (TIs) or Policy and Guidance Directives (P&GDs) that focus on a specific area may necessitate inspectors, reviewers or project manager/technical reviewers receiving special training before performing inspections or license reviews. The NMSS program area division having lead responsibility for preparing the TI or P&GD will identify these special training requirements, and communicate the training needs to the ADTD as necessary. The

schedule for preparation of any special training should allow enough advance time for the lead NMSS division, in coordination with the ADTD, to prepare the required training course and implement it, before inspection or licensing is performed using the TI or P&GD.

1246-04 DEFINITIONS

Equivalency Examination. An examination administered through the ADTD staff or its contractors, in lieu of specific course attendance.

Category. An area or class of activity for which a license may be issued, such as medical, academic, irradiators, well logging, and so on.

Core Training. Minimum formal classroom and on-the-job training required for a specific inspector, license reviewer, or project manager/technical reviewer discipline.

Specialized Training. Additional required training beyond that identified as Core Training. The additional training will be determined by the individual's supervisor and will depend on the individual's previous work experience and planned inspection or licensing activities in specific areas.

Required Initial Training. Minimum core and specialized training necessary for qualification as an inspector, license reviewer, or project manager/technical reviewer.

Supplemental Training. Additional training beyond that identified as required initial training to enhance an inspector's, license reviewer's, or project manager/technical reviewer's technical expertise. The additional training will be determined by the individual's supervisor.

Refresher Training. Training designed to update and maintain qualification.

Qualification Journal. The document that establishes the minimum training requirements for formal classroom instruction, on-the-job training, local training sessions, and self-study.

Oral Qualification Board. Board, consisting of regional or program office personnel, established to assess the qualifications of an individual to conduct the prescribed NRC inspection or licensing program.

Interim Qualification. Qualification of an inspector or license reviewer to conduct independent inspections or reviews in specified areas before completion of all qualification journal requirements.

1246-05 RESPONSIBILITIES AND AUTHORITIES

05.01 Associate Director for Training and Development, Office of Human Resources. Administers and implements the formal training programs for NMSS program area inspectors and license reviewers. Develops and maintains, in conjunction with NMSS and the Regions, the

Qualification Journals found in each Appendix B section of this chapter.

05.02 Director, Office of Nuclear Materials Safety and Safeguards (or designee). Establishes the training requirements needed for NMSS program area personnel to qualify to perform inspection and licensing activities. Ensures that headquarters inspectors and reviewers achieve and maintain qualifications in accordance with the guidelines provided in this chapter. Develops procedures for the implementation of this chapter for NMSS inspectors, license reviewers and project manager/technical reviewers. Certifies that headquarters inspectors, reviewers and project manager/technical reviewers are qualified under this chapter.

05.03 Regional Administrator (or designee). Ensures that regional inspectors and license reviewers achieve and maintain qualifications in accordance with the guidelines provided in this chapter. Develops procedures for the implementation of this chapter for regional inspectors and license reviewers. Certifies that regional inspectors and reviewers are qualified under this chapter.

05.04 Directors, NMSS and Regional Divisions. Assist the ADTD in developing, monitoring and reviewing training courses for NMSS program area qualification program. Identify and document in an individual's Qualification Journal, specialized training activities necessary to supplement core training requirements.

1246-06 TRAINING ACTIVITIES

06.01 Personnel assigned as inspectors or license reviewers project manager/technical reviewers in the NMSS program area must successfully complete the requirements for their individual inspection or licensing areas, as listed in each Section of Appendix A and the appropriate Qualification Journal.

- a. Written examinations will be used for designated courses to evaluate the candidate's understanding of the material. The passing grade for most examinations is 70 percent.
- b. Not all courses have formal examinations. In these cases, satisfactory course completion is determined by attendance and completion of class activities.
- c. Individuals who fail examinations may be given the opportunity to review the material through self-study and may then be reexamined. If deemed desirable, individuals who fail a course may also repeat the course in accordance with established ADTD policy.
- d. In all cases, completion of formal training courses will be documented by official correspondence from the provider of the training and will be documented in the agency wide training tracking system.

1246-07 QUALIFICATION JOURNAL COMPLETION

07.01 Newly assigned inspectors, license reviewers, or project manager/technical reviewers will

be assigned a Qualification Journal. The journal contains a detailed series of activities and study areas as assigned by line management to be completed in a specific period, usually within the first 2 years of assignment.

1246-08 ORAL QUALIFICATION BOARD

The Board assesses the qualifications of an individual to conduct the prescribed NRC inspection or licensing program. The Board will recommend to the Regional Administrator, Office Director or their designee whether or not the individual should be certified as a qualified inspector, license reviewer, or project manager/technical reviewer.

The Regional Administrator's, Office Director's or designee's certification will be documented in the inspector's, license reviewer's, or project manager/technical reviewer's official personnel file (OPF) and the date entered in the agency wide training tracking system. This date determines when refresher training is due for each qualified individual.

08.01 Board Members. The minimum number of personnel required to constitute a Board will be three. A cross-section of qualified personnel should be included and can range from a peer-level inspector, license reviewer, or project manager/technical reviewer to a Division Director. Management of at least the branch chief level should be included on each Board. The peer-level member of the Board should be qualified in the discipline for which the candidate is seeking qualification

08.02 Board Conduct. The Regions/Headquarters may develop a list of questions, or question bank, that include all areas of the Qualification Journal. These questions should allow and encourage the individual to answer in such a way as to demonstrate a depth of knowledge and understanding of a given area, rather than to simply answer "yes" or "no". Questions should focus on those situations that require the inspector, reviewer, or project manager/technical reviewer to demonstrate a knowledge of NRC policy and philosophy, as they relate to the licensee and the implementation of the nuclear materials inspection or licensing program. Questions of a technical nature should not be excluded; however, they should not represent a major area of Board questioning.

1246-09 INTERIM INSPECTOR AND LICENSE REVIEWER QUALIFICATION

An inspector, license reviewer, or project manager/technical reviewer who has not completed all requirements for final certification in one of the areas listed in the applicable section in Appendix A may obtain interim qualification to independently perform inspections or conduct license reviews in specified areas for which prescribed training has been completed. To establish an interim certification, the individual's supervisor will evaluate the individual's qualifications and identify the categories for which interim qualification is appropriate. A request will then be generated through the individual's management for interim qualification in the identified areas. The request should be approved by the Regional Administrator, Office Director, or their designee. Approval of interim qualification will be documented and a record kept in the individual's training file.

1246-10 PROGRAM REVISIONS

This manual chapter and qualification journals are periodically (approximately every 3 years) revised to reflect the training needs of inspectors, license reviewers, and project manager/technical reviewers as determined by changes to the inspection, license reviewer, and project manager/technical reviewer procedures. When new revisions are issued, personnel who qualified under previous requirements shall remain qualified, but must complete any new formal classroom training requirements in their area within three years from the date of the revision. Personnel in the process of qualifying when new revisions are issued, may complete their qualification under their original requirements, but must complete any new formal classroom training requirements in their area within three years from the date of the revision. Waivers to specific new formal training requirements and extensions to the three year time period can be granted using the procedures outlined in Section 1246-11.

1246-11 EXCEPTIONS

11.01 Inspectors, license reviewers, or project manager/technical reviewers who, through education and prior experience of at least 5 years in the specific field, possess sufficient knowledge to meet minimum requirements, may be grandfathered. Requests for such exemptions should be made from the individual's supervisor to the Office Director or the Regional Administrator and should consider the candidate's ability to conduct inspections or licensing activities without the benefit of the additional knowledge and regulatory perspective which would be gained by attending the specific courses.

11.02 Inspectors, license reviewers, or project manager/technical reviewers qualified for one program area covered in this manual chapter, such as those for fuel cycle facilities, need not duplicate qualification requirements that are common for another discipline, such as Materials Health Physicist. The individual, after completing the additional training required, including all of the necessary specialized and technical training for the new discipline, may receive qualification in writing from the Office Director or their designee without the need for a Qualification Board, provided that the common requirements (such as requalification courses) have been kept up to date.

11.03 Inspectors, license reviewers, or project manager/technical reviewers who, through prior experience and education, possess sufficient knowledge to meet minimum requirements, may validate specific courses through satisfactory completion of equivalency examinations. Requests for equivalency examinations should be made from the individual's supervisor to the ADTD and should consider the candidate's ability to conduct inspections or licensing activities without the benefit of the additional knowledge and regulatory perspective which would be gained by attending the course. Use of these examinations is generally expected to be a rare occurrence.

11.04 The Regional Administrator or Office Director or their designee has the authority to waive any requirement or extend the time period for any requirement listed for an inspector, reviewer, or project manager/technical reviewer in this manual chapter. Justification for the waiver or extension will be documented, and entered into the individual's training file.

1246-12 POST QUALIFICATION TRAINING

This manual chapter identifies training requirements beyond those that are required for initial qualification for the experienced inspector, license reviewer, or project manager/technical reviewer. For inspectors, reviewers, or project manager/technical reviewers who have received certification of initial qualification, additional training is identified in the sections entitled "Supplemental Training" and "Refresher Training." Refresher training is required as specified under each section listed in Appendix A. This additional training recognizes that inspector, reviewer, or project manager/technical reviewer training does not stop with initial qualification, but that training should be made available for experienced inspectors, reviewers or project manager/technical reviewers on the basis of need, special circumstances, and the necessity of keeping current with inspection and licensing programs.

END

Appendices:

Appendix A, Training Activities

Appendix B, Training and Qualification Journal

