

## APPENDIX C2

### TRAINING REQUIREMENTS AND QUALIFICATION JOURNAL FOR FUEL CYCLE PROJECT MANAGER

#### I. TRAINING REQUIREMENTS

##### A. Applicability

The training described below is required for all fuel cycle project managers (PMs) assigned to manage licenses for fuel facilities.

##### B. Training

###### 1. Required Training

- a. Initial Training
  - i. Agency-Level Knowledge
  - ii. Office-Level Knowledge
  - iii. Ethics, Objectivity, and Professional Conduct
  - iv. Differing Views and Staff Diversity
- b. Core Training
  - i. PM Roles and Responsibilities
  - ii. Receiving and Accepting a Licensing Action
  - iii. Technical Review and Requesting Additional Information
  - iv. Issuing a Final Action
  - v. Interacting with Stakeholders
  - vi. Hearings
  - vii. Major Industry Events
  - viii. Environmental Reviews
  - ix. Integrated Safety Analysis
  - x. The Inspection Program
  - xi. Backfit
  - xii. On the Job Training
- c. Specialized Training
  - i. Site Access Training (H100 or H101)
  - ii. Fuel Cycle Processes (F201)
  - iii. Communications (complete at least one)
    - (1) Technical Writing
    - (2) Conducting Effective Public Meetings
    - (3) Media Training Workshop
  - iv. Risk Training (complete at least one)
    - (1) Introduction to Risk Assessment in Nuclear Material Safety and Safeguards (NMSS) (P400 or P401)
    - (2) Human Error Analysis/Human Reliability Analysis for NMSS (P406)

2. Supplemental Training. Additional training beyond that identified as Core Training. This training will be determined by the individual's supervisor. It will

depend on the individual's previous work experience and planned licensing activities in specific areas.

3. Refresher Training. Refresher training will be determined by management on a case-by-case basis.

## II. QUALIFICATION JOURNAL

### Purpose

This Qualification Journal (Journal) implements NRC Manual Chapter 1246, by establishing the minimum training requirements for personnel assigned to manage a fuel cycle license.

This Journal establishes the minimum training requirements consistent with NRC Manual Chapter 1246. The document consists of a series of qualification guides and signature cards. Each signature card is used to document task completion, as indicated by the appropriate signature blocks. It establishes the minimum knowledge levels or areas of study that must be completed for each signature card. These signature cards provide traceable documentation to show that minimum requirements are met for each fuel cycle project manager.

### Journal Format

The Qualification Cards will be divided into the following three sub-sections:

1. Evaluation Criteria
2. Tasks
3. Supervisor Approval

Each section will contain multiple items, e.g. documents, tasks, questions, etc. The tasks must be initialed by the supervisor or the proctor approved by the supervisor. The tasks will be labeled with a review tag to help identify the amount of effort the individual is expected to undertake. The review level may be adjusted by the individual's supervisor on a case by case basis.

#### Basic = B:

Scan the information, but do not read word-for-word. Become knowledgeable of the purpose and general content. Be aware the information exists, know where it can be accessed, and know how it is used. Expect Qualification Questions regarding awareness of the information and where to find it. (Example Question: If uncertain how to report travel time on the weekend, where would one find guidance on this topic.)

#### Intermediate = I:

Familiarity plus: Review the entire body of information. Understand how the information correlates to the roles, responsibilities, and assignments of the position. Expect a few Qualification Questions to be drawn from key concepts in

the material. Be prepared to give basic examples of how the information would be used on the job.

(Example Question: What role does 10 CFR 73 play in the regulation of our licensees?)

Comprehensive = C

Basic plus: Study the entire body of information thoroughly. Be prepared to explain the basic steps needed to complete key tasks associated with the subject. Rather understand and be able to describe the process, the regulatory basis, and the importance of applicable guidance.

(Example Question: If a licensee submits an ISA summary for a new facility process, describe how you would conduct the review and summarize the regulatory requirements needed for approval.)

## Proctors

In order to support the “On the Job Training” requirements, the reviewer's immediate supervisor will assign one or more reference facilities. The reviewer will work under the direction of the facilities project manager to complete the required training. Any qualified member of the staff, as approved by the supervisor, may review and initial specific items on the qualification cards. The qualification board should seek to tailor the qualification process to the experience and training level of the reviewer and to meet the needs of the NRC.

## Qualification Journal Notebook

The qualification program involves two major tasks. First, the individual must review the material specified in the Qualification Cards listed below. Once the material has been reviewed to the satisfaction of the individual's First Line Supervisor, the appropriate box below must be initialed. Second, after the qualification cards have been signed, the individual must appear before a Qualification Board, as described in Section 1246-08. At the successful completion of this Board review, the Second Line Supervisor, a Senior Executive Service (SES) manager, must provide the approval signatures. To complete your qualification, you are to complete the following signature cards. All signoffs shall include the signature of the responsible reviewer and the date. Maintain these cards in a notebook along with any background or written material required by the program. This notebook will comprise your NRC Qualification Journal.

Additional guidance, including sample oral board questions, is provided in the Knowledge Management Center at <http://nrcknowledgecenter.nrc.gov/CommunityBrowser.aspx?id=1546&lang=en-US>.

## New Employees

New employees to the agency who are hired to NMSS shall complete, “New Employee Orientation Checklist”. The NMSS “New Employee Orientation Checklist” generally includes activities that a new NMSS employee would encounter in the first few weeks of employment. For activities that require more than the first few weeks of employment, employees can finish the activities in parallel with a qualification plan. The New Employee Orientation Checklist can be found in <http://www.internal.nrc.gov/HR/pdf/orientation-checklist.pdf>.

**FUEL CYCLE PROJECT MANAGER  
QUALIFICATION JOURNAL NOTEBOOK**

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Branch: \_\_\_\_\_

Individual Education, Training and Experience (insert or attach description):

Beginning Date of Training and Qualification: \_\_\_\_\_

Proposed Completion Date of Training and Qualification:  
(not to exceed 2 years from beginning date)

Acceptance of Qualification Plan

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Branch Chief Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Completion of All Requirements except Oral Board

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Branch Chief Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Successful Completion of Oral Board

SES Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## Qualification Guide 1 Agency-Level Knowledge

PURPOSE. The purpose of this activity is to familiarize the employee with the structure of the Agency and some impacts from regulatory history on the regulatory framework under which today's NRC staff functions. Employees should gain an understanding of how the agency was formed and how it contributes as an independent agency.

### EVALUATION CRITERIA.

1. Describe the statutes authorizing NRC activities.
2. Describe the history of the NRC.
3. Describe the NRC's Strategic Plan.
4. Describe how the NRC regulates.
5. Describe the organization and functions of NRC offices.
6. Describe the License Fee Program.
7. Describe major document collections including the general topic and the intended audience of each.
8. Describe How the Commission Operates
9. Describe How the Staff Communicates With the Commission
10. Describe how the NRC responds to emergencies.

### TASKS.

1. Statutes - Locate the discussion of statutory authority on the public website. (Select "About NRC," then select "Statutory Authority".)
  - a. In general, what is the purpose of the Atomic Energy Act (AEA) of 1954?
  - b. What is 11(e)2 material? See AEA Section 11 - Definitions.
  - c. What is "Restricted Data"? See AEA Section 11 - Definitions.
  - d. What AEA section defines "Safeguards Information"? See AEA Chapter 12 - Control of Information.
  - e. What AEA section gives the public the right to know about significant actions and the right to request a hearing (e.g., to participate in the regulatory process)? See AEA Chapter 16 - Judicial Review.
  - f. When the Commission establishes an Agreement with a State, is the Commission's authority delegated or discontinued? See AEA Section 274 - Cooperation with States.
  - g. Agreements with States are limited to what material? See AEA Section 274.
  - h. In general, what is the purpose of AEA Title II?

- i. Does the NRC license or certify gaseous diffusion plants? See AEA Chapter 27 - Licensing and Regulation of Uranium Enrichment Facilities.
  - j. In general, what is the purpose of the Energy Reorganization Act (ERA) of 1974?
  - k. Does the NRC belong to a Branch of the Federal Government, or is it an independent agency? See ERA Section 201.
  - l. What employee protection is provided by the ERA? See ERA Section 211 - Employee Protection.
  - m. In general, what is the purpose of the Administrative Procedures Act? See summary on public web site.
  - n. In general, what is the purpose of the National Environmental Policy Act? See summary on public web site.
  - o. In general, what is the purpose of the Energy Policy Act of 1992? Search website. In addition, see NUREG-0980.
  - p. In general, what is the purpose of the Energy Policy Act of 2005? What security requirements did it impose? Search website. In addition, see NUREG-0980.
2. History - Locate the discussion of NRC history on the public website. (Select "About NRC," then select "History". Also see NUREG/BR-0175.)
- a. In general, what was the concern that led to re-organizing the Atomic Energy Commission and creating NRC?
  - b. How did NRC's regulatory approach change after the accident at Three Mile Island?
  - c. In general, describe some major issues that have been addressed regarding nuclear materials safety.
3. Strategic Plan - Locate the discussion of the Strategic Plan on the public website. (Select "About NRC," then select "Strategic Plan". Also see NUREG-1614.)
- a. What are the key elements of the Strategic Plan?
  - b. What is the mission of the NRC?
  - c. What are the values of the NRC?
  - d. What are the Strategic Goals of the NRC?
  - e. Scan the Strategic Outcomes and Safety Goal Strategies. Know where to find them.
4. How We Regulate - Locate the discussion of regulations on the public website. (Select "About NRC," then select "Regulations".) Describe the key elements of our regulatory system.
5. Organization - Locate the discussion of organization on the public website. (Select "About NRC," then select "Organization and Functions".)
- a. Note which office report directly to the Commission and which offices report to the Executive Director of Operations (EDO). Know where to find the information.

- b. Who is serving on the Commission currently?
  - c. What is the function of the Office of the EDO? Which Deputy EDO is responsible for our office?
  - d. Which Congressional Oversight Committees does the Office of Congressional Affairs keep informed?
  - e. Which Assistant General Counsel handles fuel cycle issues?
  - f. What kind of licenses does the Office of International Programs issue?
  - g. Who are the Public Affairs Officers in Region II?
  - h. Which office codifies Commission decisions in memoranda to the staff?
  - i. Which office investigates charges of criminal activity by NRC staff?
  - j. Which office investigates charges of criminal activity by licensees?
  - k. Which office is responsible for the Agreement State Program?
  - l. Which office manages the NRC Operations Center?
  - m. Which Region implements the Fuel Facility Inspection Program?
  - n. Which office is responsible for the Agencywide Document Access and Management System (ADAMS)?
  - o. Which office delivers your mail?
  - p. Which office implements the Employee Mentoring Program?
  - q. Which office has oversight of safety culture issues?
6. License Fee Program - Locate the discussion of fees on the public website. (Select "About NRC," then select "How We Regulate," then select "Licensing," then select "License Fees.")
- a. Why does the NRC charge fees for licensing actions?
  - b. Which parts of NRC regulations establish the fees licensees must pay?
  - c. Which office is responsible for the NRC Fee Policy?
7. Major Document Collections - Locate document collections on the **internal** website. (Under "Agencywide" select "Info Resources" and then select the collection of interest.)
- a. What are the purpose and the audience for Management Directives (See MD 1.1)?
  - b. What is a NUREG? (See brief statement on NUREG home page. Note different types of NUREGs.)
  - c. What is the purpose and audience for a Regulatory Guide? (See brief statement on Regulatory Guide home page. Note different divisions of guides.)
  - d. What is the purpose and audience of a Standard Review Plan (SRP)? SRP's are issued as what type of document?



- e. What types of documents are provided for inspectors in the Inspection Manual? (See Inspection Manual Chapter 0040, Sections 07.01 - 07.04)
  - f. What is the purpose of the Enforcement Policy (not the Enforcement Manual)? In what form is the policy being maintained currently? (Select "Enforcement" in the "Document Collections" section of the web page.)
8. How the Commission Operates - Locate discussion on public web site (Go to "About NRC", select "Organization & Functions", select "The Commission", select "Direct-Setting and Policymaking Activities".)
- a. What is a SECY paper?
  - b. What is a Commission Action Memoranda?
  - c. Check the schedule of upcoming Commission meetings and attend a meeting (on a topic related to your area if possible).
  - d. What is a Staff Requirements Memoranda?
  - e. What is a Commission Voting Record?
9. Communications with the Commission - Locate the "Offices" section on the **internal** website and select "OEDO". Select "Info for the Commission" and then select "Procedures."
- a. What is the purpose of a Drop-In Briefing Package? Know where to find the guidance.
  - b. What is the purpose of a Commissioners' Assistants Note? Know where to find the guidance.
  - c. What is the purpose of a Daily Note and a One Week Look Ahead? Know where to find the guidance.
  - d. Skim the last several EDO Updates to identify topics of interest to senior managers. (From the OEDO home page select "News from the EDO.")
  - e. If possible, attend a Commission All-Hands Meeting.
10. NRC Response to Emergencies - Locate discussion on public web site (Under "Key Topics", select "Emergency Preparedness". Scroll down and select "How We respond to an Emergency.") In addition, see MD 8.2, NRC Incident response Program.
- a. What is NRC's highest priority when responding to an emergency?
  - b. With respect to other Federal agencies, what is NRC's role when the emergency occurs at a facility licensed by NRC or an Agreement State?
  - c. What changes when an emergency rises to the level of General Emergency, or is terrorist-related?
  - d. In general, describe the NRC response modes.
  - e. Describe the Fuel Cycle Safety Team functions (On the internal web page, under Offices select NMSS, then look under Emergency Preparedness)

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

B NRC Statutory Authority

Initials	Date
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B NRC History

Initials	Date
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C NRC Strategic Plan

Initials	Date
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I How NRC Regulates

Initials	Date
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B Organization and Function of Offices

Initials	Date
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B License Fee Program

Initials	Date
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B Document Collections

Initials	Date
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B How the Commission Operates

Initials	Date
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B Communications with the Commission

Initials	Date
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B NRC Response to Emergencies

Initials	Date
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Qualification Guide 2  
Office-Level Knowledge

PURPOSE. The purpose of this activity is to familiarize the employee with the structure, procedures and functions of the Office of Nuclear Material Safety and Safeguards.

EVALUATION CRITERIA.

1. Describe the NMSS Mission, Goals, and Values.
2. Describe the NMSS organization and functions.
3. Describe NMSS Office Letters (location and general topics).
4. Describe the various coordinators that NMSS has
5. Describe the NMSS Delegation of Authority
6. Describe how to use the NMSS Ticket Tracking System

TASKS.

1. Mission, Goals and Values - Locate on internal website (Find "Offices", click on "NMSS", then scroll down and click on "Mission, Goals and Values".)
  - a. Do the NMSS goals match the Agency goals?
  - b. In general, describe the NMSS values and some aspects of those values.
  - c. Review the NMSS Operating Plan for the current fiscal year. (Located on S: drive)
2. Organization and Functions - Locate on internal website (Find "Offices", click on "NMSS", then scroll down and click on information needed.)
  - a. Who are the current Office Director and Deputy Office Director?
  - b. In general, describe the function of each division.
  - c. If you had a question about criticality safety, which Branch Chief would you call?
  - d. If you had a question about a gaseous diffusion plant, which Branch Chief would you call?
  - e. If you had a question about a certificate of compliance for a transportation quality assurance program, which Branch Chief would you call?

- f. If you had a question about the shielding in a spent fuel shipping cask, which Branch Chief would you call?
  - g. If you had a question about the Licensing Support Network for the high-level waste repository, which Branch Chief would you call?
3. Office Letters - Locate the NMSS Policy and Procedures Letters in ADAMS (Launch the ADAMS Document Manager and sign in. In the Main Library, open the NMSS P&P folder.)
- a. Note that many of these letters are outdated. Review the "NMSS P&P Index" file.
  - b. What is the policy for radiation protection of NMSS staff (see P&PL 1-42)? In addition to the responsibilities of all staff, what special responsibilities does female staff have? How do you obtain a dosimeter?
  - c. Where do you find guidance on withholding information from the public (see P&PL 1-85)? Is OGC concurrence required on routine withholding determinations?
  - d. Where do you find guidance on posting notices on the NRC website of hearing opportunities for major licensing actions (see P&PL 1-86)?
  - e. Where do you find guidelines for voice mail and e-mail (see P&PL 1-87)?
  - f. Where do you find HRMS codes you can use to charge your time (see P&PL 2-3)?
4. Office Coordinators - Locate on internal website (Find "Offices", click on "NMSS", then scroll down and click on "Contacts and Resources List".)
- a. Who is the Training Coordinator that can help you register for a class?
  - b. Who is the Event Coordinator that can help you find an event report?
  - c. Who is the Allegation Coordinator that can help you follow-up on a phone call regarding discrimination by a licensee?
  - d. Who is the Enforcement Coordinator that can help you prepare for an enforcement panel?
  - e. Who is the Generic Communications Coordinator that can help you write an Information Notice?
  - f. Who is the Inspection Manual Coordinator that can help you revise an Inspection Procedure?
  - g. Who is the Radiation Safety Officer who can help you get a dosimeter?

5. Delegation of Authority - Locate on internal website (Find "Offices", click on "NMSS", then scroll down to "Quick Links" and click on "Delegation of Authority".)
  - a. Note the actions that must be signed by the Office Director.
  - b. Under FCSS, who can approve licensing actions (amendments, reviews, renewals, and new applications)?
  - c. Who can approve travel?
  - d. What can a Project Manager approve?
  
6. Ticket Tracking System - Locate on internal website (Find "Offices", click on "NMSS", then scroll down and click on "Ticket Status".)
  - a. Run a report on all open tickets due in the next 30 days. Note the type of actions being tracked.
  - b. Open a ticket. What do the Special Instructions say? Who has the lead? Are other people assigned to provide input? When is input due? When is the final product due?
  
7. Read the most recent "Director's Greeting" and "Deputy Director's Corner." Attend an NMSS All Hands Meeting.

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

- C NMSS Mission, Goals, and Values
- I Organization and Functions
- B NMSS Office Letters
- B Office Coordinators
- B Delegation of Authority
- B Ticket Tracking System
- B Director Messages and All Hands Meeting

Initials	Date
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Initials	Date
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Initials	Date
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Initials	Date
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Initials	Date
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Initials	Date
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## Qualification Guide 3 Ethics, Objectivity and Professional Conduct

**PURPOSE.** The purpose of this activity is to acquaint employees with the NRC's expectations of employee conduct, protocol, and professionalism. Employee conduct is a vital component of the NRC's credibility as an effective regulator. Employees represent the Agency in interactions with licensee management and workers, local officials, media, and the public. This activity will assist employees to understand NRC procedures, policies, and expectations related to Headquarters employee conduct. This activity will also help employees enhance their professional conduct that is needed to be an effective employee.

### **EVALUATION CRITERIA.**

1. Describe the behavior expected of NRC employees at work.
2. Describe what the "appearance of impartiality or impropriety" means.
3. In general, describe the Office of Government Ethics (OGE) standards of ethical conduct.
4. Describe the behavior expected when NRC employees interact with other parties.
5. Describe the behavior expected when NRC employees visit other locations.

### **TASKS.**

1. Behavior at Work - Locate ethics information on the internal website. (Under Offices, select "OGC," then select "Ethics." Complete the online training if not completed already. Review the resource information provided. If the answer cannot be found, call one of the OGC contacts listed or consult your supervisor.)
  - a. With regard to alcohol and illegal drugs?
  - b. With regard to official business and personal relationships?
  - c. With regard to business partnerships with licensees?
  - d. With regard to work habits and professional demeanor?
2. Appearance of Impartiality - Complete the online ethics training described in Task 2.

3. OGE Standards of Conduct regarding the following – Complete the online ethics training in Task 2:
  - a. Gifts from outside sources.
  - b. Gifts between employees.
  - c. Conflicting financial interests.
  - d. Seeking other employment.
  - e. Misuse of power.
  - f. Outside activities.
4. Interaction with Other Parties – Complete the online ethics training in Task 2. Review the NRC Principles of Good Regulation and NMSS Values (Go to public website, select “About NRC,” then select “Values”.)
  - a. Personnel of licensees, vendors or applicants.
  - b. Other NRC employees.
  - c. Members of the general public; another resource is the Office of Public Affairs.
  - d. Public interest groups - Another resource is the Office of Public Affairs.
  - e. Allegers and concerned citizens - Another resource is the NMSS Allegation Coordinator.
5. Conduct at other Locations - Complete the online ethics training in Task 2. Review the NRC Principles of Good Regulation and NMSS Values (Go to public website, select “About NRC,” then select “Values”.)
  - a. The site of licensees, vendors or applicants.
  - b. Headquarters, regional office or training center.
  - c. Public meetings.
  - d. Conferences.

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C Behavior at Work

Initials	Date
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C Appearance of Impartiality

Initials	Date
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B Standards of Conduct

Initials	Date
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I Interaction with Other Parties

Initials	Date
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I Conduct at Other Locations

Initials	Date
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## Qualification Guide 4 Differing Views and Staff Diversity

PURPOSE. The purpose of the activity is to become familiar with the informal and formal processes for pursuing resolution of differing views or opinions and encourage diversity in opinion and staff. Our workforce represents diversity in gender, ethnicity, occupation, and age, and that diversity makes us stronger. It is the policy of the NRC and the responsibility of all NRC supervisory and managerial personnel to maintain a working environment that encourages each employee to make known his/her best professional judgment even though that judgment may differ from the prevailing staff view, disagree with a management decision or policy position or take issue with proposed or established agency practices.

### EVALUATION CRITERIA.

1. In general, describe the Differing Professional Opinion (DPO) program.
2. Describe the NRC Non-concurrence process.
3. Describe an Open Collaborative Work Environment.
4. Describe the Open Door Policy.
5. Describe the grievance process.
6. In general, describe how the Agency supports diversity in the staff.

### TASKS.

1. DPO Program - Locate MD 10.159, "The NRC Differing Professional Opinions Program". In addition, locate information on Differing Views on the internal website (Under "Agencywide" select "Employee Resources," scroll down to "Employee Concerns" and select "Differing Views").
  - a. What is the DPO policy?
  - b. What are the objectives of the program?
  - c. In general, how is a DPO submitted?

2. Non-Concurrence Process - Locate MD 10.158, "NRC Non-Concurrence Process". In addition, locate information on Non-Concurrence Process on the internal website under Differing Views.
  - a. What is the NCP policy?
  - b. What are the objectives of the program?
  - c. In general, how does the process work?
3. Open Collaborative Work Environment - On the internal website, look under Agencywide links and select OCWE.
  - a. What is an OCWE?
  - b. What does it mean to be a "Team Player"?
  - c. Describe the different ways to raise a concern.
4. Open Door Policy - Locate MD 10.160, "Open Door Policy". In addition, locate information on the Open Door Policy on the internal website under OCWE.
  - a. What is the Open Door Policy?
  - b. What are the objectives of the program?
  - c. In general, how does the process work?
5. Grievance Process - Locate the Grievance Procedures in the Collective Bargaining Agreement (On the internal website, under "Agencywide" select "Employee Resources," scroll down to "Union" and select "Collective Bargaining Agreement." In the agreement, go to Article 51 - Grievance Procedures.)
  - a. What is considered a grievance?
  - b. What matters are excluded from the process?
  - c. Know how to contact the Union office for more information.
6. Diversity - Locate NUREG/BR-0316, "Comprehensive Diversity Management Plan".
  - a. What are the goals of the Diversity Management Program?
  - b. What is the role of an employee in the program?
  - c. If possible, attend an EEO Commission briefing.

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

B DPO Program

Initials	Date
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B Non-Concurrence Process

Initials	Date
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C Open Collaborative Work Environment

Initials	Date
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B Open Door Policy

Initials	Date
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B Grievance Process

Initials	Date
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B Diversity

Initials	Date
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## Qualification Guide 5 PM Roles and Responsibilities

PURPOSE. The purpose of the activity is to become familiar with the roles and responsibilities of an FCSS Project Manager.

### EVALUATION CRITERIA.

At the completion of this activity, you should have a clear understanding of the following:

1. Understand the roles and principal functions of a PM.
2. Expectations regarding communication with a licensee.
3. The documents that PMs should maintain.
4. Expectations regarding knowledge of the facility.

### TASKS.

1. PM Roles and Functions - Locate Section 2.1 of the Fuel Cycle PM Handbook. (On the **Internal** website, select "Organization," then click on "NMSS," then select "Quick Links.") In general, describe the roles and functions of a Fuel Cycle PM.
2. Communications - Locate Section 2.2 of the PM Handbook.
  - a. Describe the flow of communications regarding licensing actions.
  - b. How often should PMs visit their sites?
  - c. Visit a Senior PM and ask what contact information the PM uses to communicate with the licensee and the Region.
3. Documents - Locate Section 2.3 of the PM Handbook.
  - a. What documents should a PM maintain in the office? Make a list.
  - b. Visit a Senior PM and ask to see the documents on the list. How big are they? Where does the PM keep them? How often does the PM use them?

4. Knowledge of the facility - Locate Section 2.4 of the PM Handbook.

- a. In general, describe the knowledge a PM should have of a facility.
- b. Describe how a PM maintains unescorted access. Consult the NMSS Radiation Safety Officer if necessary.
- c. Visit a Senior PM and ask how the PM responds to questions and requests for information (i.e., briefing packages, etc.).

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C PM Roles and Functions

Initials	Date
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C Licensing Communications

Initials	Date
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C PM Documents

Initials	Date
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C Knowledge of the Facility

Initials	Date
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## Qualification Guide 6 Receiving and Accepting a Licensing Action

PURPOSE. The purpose of the activity is to become familiar with how FCSS receives and accepts a licensing action.

### EVALUATION CRITERIA.

At the completion of this activity, you should have a clear understanding of the following:

1. How a licensing action is recorded (or "docketed") when it is received.
2. How the staff determines what information is released to the public and what information is withheld (i.e., withholding determination).
3. What a Technical Assignment Control (TAC) number is and how you obtain one.
4. What the Operating Plan is and what measures (or metrics) apply to licensing actions.
5. How the PM creates a schedule in the Licensing Action Tracking System.
6. How the PM acknowledges receipt of a licensing action.
7. How the PM prepares Technical Assistance Requests (TARs).
8. How the PM conducts an acceptance review.
9. When is a Notice of Proposed Action required to be published in the Federal Register?

### TASKS.

1. Docketing - Locate Chapter 6 of the PM Handbook
  - a. How should correspondence to NRC be addressed?
  - b. Work with a PM and OIS to have your e-mail address added to the E-RIDS distribution list for a facility.
  - c. Ask a PM for an example of an E-RIDS message with the "Non-Public Pending Review" statement. Work with the PM to conduct a SUNSI review and provide the results to ADAMS staff. Review the guidance on withholding information from the public in Chapter 8 of the PM Handbook (ML082520558).
  - d. What should the PM do if an original document is received without going to the Document Control Desk first?

- e. How is financial assurance documents handled differently?
- f. Ask a PM to show you how a classified document received from the Caller Box should be handled.
- g. Complete the annual Computer Security Awareness Training (web based).
- h. Complete the annual Information Security Awareness Training (web based).

## 2. Withholding Determination - See Chapter 8 of the PM Handbook

- a. What right does the public have under the Atomic Energy Act that requires the public to have access to information about licensing actions?
- b. What does 10 CFR 2.390(a) say about all correspondence to and from the NRC?
- c. What happens if we don't believe the licensee has provided a compelling reason to withhold information from the public?
- d. Why an affidavit required for information isn't withheld under 10 CFR 2.390(d)? What does the referenced section in 10 CFR 9.17 state?

## 3. TAC Numbers - See NRC Form 758 in Informs.

- a. Ask your Licensing Assistant (LA) what information the LA needs to open a new TAC number using Form 758.
- b. How is the TAC number used in HRMS to charge time spent on a licensing action?

## 4. Op Plan Metrics - See baseline operating plan for the current fiscal year in S:\FCSS Operating Plan\FY ####\Baseline.

- a. What is the metric for completing licensing actions?
- b. What is the metric for major milestones of new applications and renewals?
- c. What is the metric for issuing licensing actions without technical deficiencies?
- d. What are the metrics for completing reviews of annual updates to Integrated Safety Analysis (ISA) Summaries?
- e. What the openness metrics for public meetings are with regard to: (1) meeting location, (2) meeting notice; (3) consideration of stakeholder comments; (4) feedback forms; (5) communication plans; and (6) meeting summaries?

## 5. Licensing Action Tracking System

- a. Get the shortcut to the Licensing Action Tracking System added to your computer desktop.
  - b. Ask a PM to show you how to create a new record with milestones for completing a licensing action within the metric timeframe.
6. Acknowledging Receipt - See Chapter 9 of the PM Handbook. Acknowledging receipt of licensee submittal is a courtesy that the PM can send by e-mail or letter.
7. Technical Assistance Requests (TARs) - See Chapter 11 of PM Handbook.
- a. Ask a PM for examples of TARs. Note that due dates should match milestones in the Licensing Action Tracking System. Revise the tracking system to reflect commitments made by the supporting branch. Inform management if additional time requested by supporting branch will cause a metric to be exceeded.
  - b. Which branch provides assistance for criticality safety?
  - c. Which branch provides assistance for fire safety?
  - d. Which branch provides assistance for radiation safety?
  - e. Which branch provides assistance for environmental reviews?
  - f. Which branch provides assistance with material control and accounting (MC&A)?
  - g. Which branch provides assistance with physical security?
  - h. Which branch provides assistance with emergency preparedness?
  - i. Which branch provides assistance with information security regarding Safeguards Information (Part 73) and classified information (Parts 25 and 95)?
8. Accepting for Detailed Review - See Chapter 9 of the PM Handbook.
- a. What does 10 CFR 70.22 and 70.65 require an application for a new license (or license renewal) to contain?
  - b. Review a standard review plan (such as NUREG-1520) and note the "Areas of Review" sections. An acceptance review scans submittals to identify major deficiencies in the information provided for each area of review. Major deficiency means the information for an area of review is missing, or is so inadequate that NRC would be unable to make findings regarding the acceptance criteria for that area.

Note: Standard review plans (SRPs) may not address all of the content requirements in 10 CFR 70.22 and 70.65. Some SRPs focus on the safety



requirements and fail to address the safeguards requirements (e.g., security plans). An acceptance review must address all of the content requirements that apply to the request.

- c. Where do you find the template for an acceptance letter?
- d. What happens if the application isn't acceptable for detailed review?

9. Federal Register Notice (FRN) - See Exhibit 9.1 (including footnotes) in the PM Handbook.

- a. When is a notice of proposed action required? (See 10 CFR 2.105 and 2.1301)

Note: Part 2 defines "facility" as a production or utilization facility as defined in Part 50. This excludes most fuel cycle facilities.

- b. What is the standard format for the FRN? (The language tends to change, but consult the ADM website at <http://www.internal.nrc.gov/ADM/DAS/cag/notices/ntemps.html>, and the OGC website at [http://www.internal.nrc.gov/ogc/services/FRN\\_templates/index.html](http://www.internal.nrc.gov/ogc/services/FRN_templates/index.html).)

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C Docketing

Initials	Date
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C Withholding Determination

Initials	Date
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C TAC Numbers

Initials	Date
----------	------

I Op Plan Metrics

Initials	Date
----------	------

C Licensing Action Tracking System

Initials	Date
----------	------

C Acknowledging Receipt

Initials	Date
----------	------

C Technical Assistance Requests

Initials	Date
----------	------

C Accepting for Detailed Review

Initials	Date
----------	------

I Federal Register Notice of Proposed Action

Initials	Date
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Qualification Guide 7  
Beginning a Technical Review and Requesting Additional Information

PURPOSE. The purpose of this activity is to become familiar with procedures for conducting technical reviews and requesting additional information from applicants.

EVALUATION CRITERIA.

1. Describe the objective of the technical review (the evaluation report).
2. Describe the process for requesting additional information from an applicant.
3. Describe the typical follow-up actions if a response fails to close an issue.

TASKS.

1. Objective of the Technical Review (see Chapter 12 of the PM Handbook)
  - a. What is the purpose of an SER?
  - b. Why should a draft SER be prepared before additional information is requested?
  - c. Where can you find suggested wording for evaluation findings? (See a standard review plan such as NUREG-1520.)
2. Request for Additional Information (see Chapter 13 of the PM Handbook)
  - a. Describe how an RAI question should be worded.
  - b. Why must a regulatory requirement be cited?
  - c. Is compliance with guidance required? (See the statement at the bottom of first page of any *final* Regulatory Guide.)
  - d. Why is it useful to call a licensee and discuss the requests before they are issued?
  - e. What does 2.108(a) say about RAI responses?
3. Follow-up of Open Issues
  - a. What is the preferred follow-up action when an RAI response fails to close an issue – a direct conversation (meeting/call) or another RAI letter?
  - b. Why is a summary of a meeting/call required to be placed in ADAMS?

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C Objective of Technical Review

Initials	Date
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C Request for Additional Information

Initials	Date
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C Follow-up of Open Issues

Initials	Date
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Qualification Guide 8  
Completing a Technical Review and Issuing the Final Action

PURPOSE. The purpose of this activity is to become familiar with procedures for completing technical reviews and issuing final licensing actions.

EVALUATION CRITERIA.

1. Describe the final action for a review requiring no amendment of the license.
2. Describe the final action for a license amendment/renewal.
3. Describe additional actions that may be required after the licensing action is issued.

TASKS.

1. Final Action for a Review (see Overview of Acceptance of Site Plans in Section 9.5 of the PM Handbook)
  - a. Describe the content of the final acceptance letter (see template in Section 9.6 of PM Handbook).
  - b. Is an SER included in the final action?
  - c. Where is the evaluation of the change documented?
  - d. Work with a PM to prepare a final acceptance letter for an action that did not require prior NRC approval.
2. Final Action for Amendment/Renewal (see Overview of Transmittal Letter for a Renewal or Amendment in Section 9.5 of the PM Handbook)
  - a. Describe the final package (letter and enclosures) for a license amendment/renewal. (see templates in Section 9.6 of the PM Handbook)
  - b. Describe the format of a Materials License (see Chapter 10 of the PM Handbook)
  - c. Discuss special considerations for exemptions. (see Section 10.4 of the PM Handbook)
  - d. When would a license term less than the maximum be considered? (see Section 10.5 of the PM Handbook)
  - e. Describe the format of Safety/Safeguards Evaluation Report (SER). What sections are required to be in every SER? (See Chapter 12 of the PM Handbook).
  - f. Why must SERs be coordinated with inspection staff?

g. Work with a PM to prepare a final license amendment/renewal.

3. Additional Actions That May be Required

- a. When is a Notice of Issuance required to be published in the Federal Register? (see 10 CFR 2.106)
- b. If a Communications Plan was developed for a high visibility action, what notifications and actions are typically required when the final action is issued? (see Chapter 19 of the PM Handbook)
- c. If a hearing board has been established, what is required when the final action is issued? (see PPL 1-86)

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C Final Action for Review

Initials	Date
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C Final Action for Amendment/Renewal

Initials	Date
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C Additional Actions That May Be Required

Initials	Date
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## Qualification Guide 9 Interacting with Stakeholders

PURPOSE. The purpose of this activity is to become familiar with procedures for interacting with other NRC staff, licensees, and the public.

### EVALUATION CRITERIA.

1. Describe how a PM should interact with a licensee.
2. Describe how a PM should interact with inspection staff.
3. Describe how a PM should interact with the Office of General Counsel (OGC).
4. Describe how a PM should interact with the public.

### TASKS.

1. Interacting with a Licensee (see Chapters 4 and 5 of the PM Handbook):
  - a. How does a PM maintain objectivity?
  - b. How should licensee documents be handled?
  - c. How should conference calls be used and documented?
  - d. When should meetings and conference calls be open to the public?
  - e. How many days before an open meeting must a meeting notice be posted?
  - f. How does a PM handle a call from a licensee employee alleging problems at the site? (Complete the online Allegation training. On the internal website, go to the Training page, select iLearn, log-in and search under online items.)
  - g. When is a Communication Plan needed for a licensing action? Where is the guidance located? (See Chapter 19 of the PM Handbook. In addition, go to Internal Web Site, select Information Resources, and then look for the Communications section.)
2. Interacting with Inspection Staff (see Chapters 4 and 5 of the PM Handbook):
  - a. Which areas are inspected by Headquarters staff and which areas are inspected by Regional staff?
  - b. Who are the Project Inspectors for each fuel facility? (On the internal web site, select RII, and then click on the tab for DFFI. Select a Regulated Facility from the list provided and note the Key Information provided for each facility.)

- c. Review some recent inspection reports for a fuel facility. Were there any violations? Were there any inspection follow-up items? Were there any unresolved issues?
  - d. Review the last License Performance Review (LPR) for a fuel facility. Did it identify any areas needing improvement?
  - e. Review an Enforcement Action Worksheet (EAW) and attend an enforcement panel for a proposed violation. What is the PM's role in the enforcement process? (See Section 5.4 of the PM Handbook)
3. Interacting with OGC (see Chapter 4 of the PM Handbook)
- a. Does OGC report to the EDO or the Commission?
  - b. How should documents be sent to OGC for review?
  - c. What does No Legal Objection (NLO) mean?
  - d. In general, what does OGC need to review? Not review?
4. Interacting with the Public (see Chapters 4 and 5 of the PM Handbook)
- a. Describe how a PM should communicate with the public. What should a PM strive to do? What should a PM refrain from doing?
  - b. Describe how a public meeting should be conducted. What statements should be made? What forms should be provided? How should it be documented?
  - c. How does a PM handle remarks from a member of the public alleging licensee misconduct or problems at the site? (Complete the online Allegation training.)
  - d. What does 10 CFR 2.206 allow a member of the public to request? Describe the process for handling these requests.



**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

C Interacting with a Licensee

Initials	Date
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C Interacting with Inspection Staff

Initials	Date
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C Interacting with OGC

Initials	Date
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C Interacting with the Public

Initials	Date
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## Qualification Guide 10 Hearings

PURPOSE. The purpose of this activity is to become familiar with the hearing process.

### EVALUATION CRITERIA.

1. Describe the difference between a mandatory hearing and a requested hearing.
2. Describe the different types of hearing procedures.
3. Describe procedures for staff support of the hearing process.

### TASKS.

1. Mandatory vs. Requested Hearing (see Chapter 18 of the PM Handbook):
  - a. A hearing is mandatory when it is required by the Atomic Energy Act, or by regulation. Part 2 says a hearing is mandatory when a license for a facility is requested. How is “facility” defined in Part 2? Does it include fuel facilities?
  - b. For what fuel facilities are hearings mandatory? (see 70.23a inserted between 70.23 and 70.24)
  - c. If not mandatory, when must an opportunity to request a hearing be offered for fuel facility license application? (see 2.105)
  - d. How does NMSS interpret the phrase “any other license or amendment to which the Commission determines that an opportunity for a public hearing should be afforded”?
  - e. In a contested hearing, what must a person do to be admitted to the hearing?
2. Types of Hearing Procedures (see Chapter 18 of the PM Handbook):
  - a. What office represents the staff (and advises the staff) in a hearing?
  - b. What subpart of Part 2 contains the general rules for hearings?
  - c. What subpart of Part 2 contains the rules for formal hearings?
  - d. What subpart of Part 2 contains the procedures for informal hearings?
  - e. What subpart of Part 2 contains the procedures for license transfer hearings?
  - f. What subpart of Part 2 contains the procedures for expedited oral hearings?
3. Staff Support of the Hearing Process (see NMSS Policy and Procedures Letter 1-86):

- a. During a pre-hearing conference, could the staff be asked to issue an SER even though there are still open issues?
- b. In general, describe what documents must be placed in the hearing file.
- c. How often must the hearing file be updated?
- d. What must the PM sign regarding the disclosure of documents?
- e. What role does the PM serve in preparing written testimony?
- f. What role does the PM serve in preparing rebuttal testimony?
- g. How does the staff ask questions in a hearing?

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**I** Mandatory vs. Requested Hearings

Initials	Date
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**B** Types of Hearings

Initials	Date
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**I** Staff Support of Hearings

Initials	Date
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Qualification Guide 11  
Major Industry Events and Regulatory Implications (Lessons Learned)

PURPOSE. The purpose of this activity is to familiarize the employee with some of the lessons learned from selected major nuclear operating and fuel cycle events and resulting changes that were made to NRC regulations or regulatory practices.

EVALUATION CRITERIA.

1. Criticality Events
2. Fires
3. Three Mile Island (unique event)
4. UF6 Releases
5. Spills
6. Red Oil

TASKS.

1. Criticality Events:

- a. The Y-12 Accident (see Los Alamos Report LA-13638, <http://nrcknowledgecenter.nrc.gov/adl/en-US/2721/file/967/la-13638.pdf>)
  - i. Briefly describe the accident.
  - ii. What technical area received extra attention as a result of this event?
- b. The United Nuclear Fuels (a.k.a. Wood River Junction) Accident (see Los Alamos Report LA-13638, <http://nrcknowledgecenter.nrc.gov/adl/en-US/2721/file/967/la-13638.pdf>)
  - i. Briefly describe the accident.
  - ii. Why did this event result in extra attention to working only with written procedures that have received formal review and approval?
- c. The GE-Wilmington Accident (see the Executive Summary of NUREG-1450)
  - i. Briefly describe the event.
  - ii. What was wrong with the workers attitude towards the hazard of low-enriched uranium?

- iii. What was wrong with NRC oversight of the facility?
- iv. Why is the loss of a criticality control reportable under 20.403 (now 20.2202) even though a criticality accident hasn't occurred? (see Bulletin 91-01)
- v. Where is this reporting requirement addressed in the regulations today? (See Appendix A of Part 70)

## 2. Fires

- a. Rocky Flats 1969 (see <http://www.colorado.edu/journalism/cej/exhibit/1969fire01-08.html>)
  - i. Briefly describe the event.
  - ii. Why did this event result in much greater industry attention to machining operations and the amount of combustible material in process areas?
- b. Browns Ferry 1975 (see NUREG/BR-0175, <http://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0175/br0175.pdf>)
  - i. Briefly describe the event.
  - ii. What safety issues received extra attention as a result of the event?
- c. Three Mile Island (see NUREG/BR-0175, <http://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0175/br0175.pdf>)
- d. Briefly describe the event.
- e. What safety issues received extra attention as a result of the event?
- f. What new NRC office was created?
- g. What new rule was imposed on fuel facilities as a result of TMI? (see Federal Register notice, 54 FR 14051, dated April 7, 1989)

## 3. UF6 Release - Sequoyah Fuels 1986 (see the Executive Summary of NUREG-1198)

- a. Briefly describe the event.
- b. What changes were recommended as a result of the event?
- c. How were hazardous chemicals addressed in the emergency plan rule? (see Federal Register notice, 54 FR 14051, dated April 7, 1989)

## 5. Spills – Nuclear Fuel Services 2006 (see Inspection Report at ML061630373 and Confirmatory Order at ML070520607)

- a. Briefly describe the event.
  - b. Why did this event result in more attention to configuration management and change control?
  - c. How did the Order address the safety culture concerns?
6. Red Oil – Tomsk, Russia 1993 (see IAEA report at [http://www-pub.iaea.org/mtcd/publications/pdf/p060\\_scr.pdf](http://www-pub.iaea.org/mtcd/publications/pdf/p060_scr.pdf))
- a. Briefly describe the event.
  - b. What is Red Oil?
  - c. Why is it a concern in solvent extraction processes?

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive = **C**

B Criticality Events

Initials	Date
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B Fires

Initials	Date
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B Three Mile Island

Initials	Date
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B UF6 Releases

Initials	Date
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B Spills

Initials	Date
----------	------

B Red Oil

Initials	Date
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## Qualification Guide 12 Environmental Reviews

PURPOSE. The purpose of this activity is to become familiar with the purpose and requirements of environmental reviews.

### EVALUATION CRITERIA.

1. Purpose and scope of environmental protection regulations.
2. Environmental Impact Statement.
3. Environmental Assessment
4. Categorical Exclusion.
5. Use of environmental review results.

### TASKS.

#### 1. Purpose and Scope of Environmental Protection Regulations:

- a. Briefly describe the scope of NRC environmental protection regulations (see 10 CFR 51.1).
- b. Do the regulations apply to all domestic licensing actions?
- c. Do the regulations apply to the environment of other nations?
- d. What is the purpose of an environmental review? (see Chapter 15 of the PM Handbook and Chapter 1 of NUREG-1748)

#### 2. Environmental Impact Statement (EIS):

- a. What is an EIS? (see definition in 51.14 and Chapter 1 of NUREG-1748)
- b. What types of fuel facility licensing actions require an EIS? (see 51.20) Note: The phrase “issuance of a license” is interpreted to mean issuance of a new license.
- c. Why has an EIS never been performed for many fuel facilities? (see below)
  - i. In what year was the National Environmental Policy Act (NEPA) passed? (see 51.10(a))
  - ii. NEPA established the Council on Environmental Quality (CEQ) to impose regulations on all Federal agencies to perform environmental reviews. In what year did CEQ issue its regulations? (see 51.10(a))

- iii. In turn, NRC had to issue regulations to implement the CEQ requirements. In what year was Part 51 first issued? (See citations in brackets at the end of 51.4. What is the year of the first citation?)
- iv. Many fuel facilities were already licensed and operating when final regulations were issued for environmental reviews. Although licensing a new fuel facility is likely to have a significant impact on the environment, is authorizing an existing facility to continue operation likely to have a significant impact?

### 3. Environmental Assessment (EA):

- a. What is an EA? (see definition in 51.14)
- b. What types of licensing actions require an EA? (see 51.21)
- c. An EA will result in a decision to prepare 1 of 2 documents. What are they? (see Chapter 15 of the PM Handbook and Chapter 1 of NUREG-1748)

### 4. Categorical Exclusion (CatX):

- a. What is a CatX? (see definition in 51.14)
- b. Briefly describe the categories that have been excluded from an environmental review. (see 51.22)
  - i. Is a rulemaking amending Part 70 excluded? [see 51.22(c)(3)]
  - ii. License amendments are excluded if they are administrative, organizational, or procedural. What criteria must be satisfied to use this exclusion? [see 51.22(c)(11)]
  - iii. Are license amendments related to security issues excluded? [see 51.22(c)(12)]
  - iv. When is an exemption from the regulations excluded? [See 51.22(c)(25)].

### 5. Use of Environmental Review Results:

- a. How does the environmental review affect the approval of license applications? [see 70.23(a)(7)]
- b. If the action will have an impact on the environment, can the Commission still approve it?

### **SUPERVISOR APPROVAL:**



Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**B** Purpose and Scope of Regulations

Initials	Date
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**I** Environmental Impact Statement

Initials	Date
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**I** Environmental Assessment

Initials	Date
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**I** Categorical Exclusion

Initials	Date
----------	------

**C** Use of Environmental Review Results

Initials	Date
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## Qualification Guide 13 Integrated Safety Analysis

PURPOSE. The purpose of this activity is to become familiar with how Integrated Safety Analysis (ISA) and the ISA Summary are used within the fuel cycle licensing process.

### EVALUATION CRITERIA.

1. Purpose of an Integrated Safety Analysis (ISA) and an ISA Summary
2. Use of the ISA Summary during a licensing review.
3. Annual updates to ISA Summaries.

### TASKS.

1. Purpose of an ISA and an ISA Summary: (see Section 3.1 of NUREG-1520)
  - a. Briefly describe what an ISA does. [see definition in 70.4 and requirements in 70.62(c)]
  - b. Only a summary of the ISA is submitted to the NRC. Describe the information an ISA Summary must contain. (see definition in 70.4 and requirements in 70.65)
  - c. NRC focuses resources on items relied on for safety (IROFS). Describe what an IROFS is. (see definition in 70.4)
  - d. What is a management measure? [see definition in 70.4 and requirements in 70.62(d)]
2. Use of ISA Summary during a licensing review:
  - a. What must reviewers confirm with an ISA Summary? (see Section 3.1 of NUREG-1520)
  - b. What is the purpose of reviewing commitments to management measures in a license application? (See Section 11.1 in NUREG-1520).
  - c. How is the ISA Summary used by other technical reviewers? (see the section on “Areas of Review” in Chapters 4, 5, 6, 7, 8, and 9 of NUREG-1520)

3. Annual Updates to ISA Summaries: (see Chapter 14 of the PM Handbook)
  - a. Describe the acceptance review and type of information an update should contain.
  - b. What are the 5 criteria used in the screening process?
  - c. Describe the Smart Review Process.
  - d. How are insights gained by the review shared with inspection staff?

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**C** Purpose of an ISA and an ISA Summary

Initials	Date
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**C** Use of ISA Summary during licensing review.

Initials	Date
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**C** Annual updates to ISA Summaries

Initials	Date
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## Qualification Guide 14 The Inspection Program

PURPOSE. The purpose of this activity is to become familiar with the inspection program for fuel cycle facilities.

### EVALUATION CRITERIA.

1. Types of Inspection Manual Documents.
2. NMSS Responsibilities for the Inspection Manual
3. The Fuel Cycle Inspection Program in MC 2600
4. Other Fuel Cycle Inspection Programs

### TASKS.

1. Types of Inspection Manual Documents (see Manual Chapter 0040, on the internal web site, select Info Resources, scroll down to Key Guidance Documents and select Inspection Manual)
  - a. What information does a Manual Chapter (MC) contain? (see definitions in Section 0040-03 and formats in Section 0040-07)
  - b. What information does an Inspection Procedure (IP) contain?
  - c. What information does a Temporary Instruction (TI) contain?
2. NMSS Responsibilities
  - a. What are the NMSS responsibilities in the inspection manual? (see Section 0040-04)
  - b. Who is the current NMSS Inspection Manual Coordinator? (on the internal web site, select NMSS, and then select the Contacts and Resources List)
3. Fuel Cycle Inspection Program in MC 2600
  - a. NSIR is responsible for what part of the inspection program? (see Section 2600-05)
  - b. The FCSS/Technical Support Branch is responsible for what part of the inspection program?
  - c. The FCSS/Material Control and Accounting Branch is responsible for what part of the inspection program?

- d. In general, describe the inspection program elements. (see Section 2600-07)
- e. What is the Master Inspection Plan? (see Section 2600-08)
- f. What tools are used to assess facility performance? (see Section 2600-12)
- g. Under the Core Inspection Program, what type of fuel facility receives the most inspection effort? (see MC 2600, Appendix B)
- h. In general, describe the Resident Inspector program. (see MC 2600, Appendix C)
- i. When planning for an inspection, what input is requested from the PM? (see MC 2600, Appendix D)

4. Other Fuel Cycle Inspection Programs

- a. What program is defined in MC 2602?
- b. What program is defined in MC 2630?
- c. What programs are defined in MC 2681, 2682, and 2683? (see Security Related Inspection Program Documents)
- d. What programs are defined in MC 2694 and 2696?

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**B** Types of Inspection Manual Documents

Initials	Date
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**B** NMSS Responsibilities

Initials	Date
----------	------

**I** Fuel Cycle Inspection Program in MC 2600

Initials	Date
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**B** Other Fuel Cycle Inspection Programs

Initials	Date
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## Qualification Guide 15 Backfit

PURPOSE. The purpose of this activity is to become familiar with the requirements and limitations placed upon the NRC staff when proposing new requirements or new interpretations of requirements for licensees or applicants

### EVALUATION CRITERIA.

1. Backfit Requirements

2. Backfit Guidance

### TASKS.

1. Backfit Requirements

- a. How is backfitting defined? [see 70.76(a)(1)]
- b. In general, what is the Commission required to do before imposing a backfit? [see 70.76(a)(2) and (a)(3)]
- c. In general, when is a backfit analysis not required for a new rule or staff position? [see 70.76(a)(4)]

2. Backfit Guidance

- a. Where is the guidance for implementing backfit requirements? (see NMSS Policy and Procedures Letter 1-82)
- b. What is the NMSS policy regarding backfitting?
- c. In general, describe how backfits are identified (see Section IV of PPL 1-82)
- d. In general, what is the difference between a documented evaluation and a backfit analysis? (see Sections V, VI, and VII of PPL 1-82)
- e. Describe the appeal process for backfit decisions. (see Section VIII of PPL 1-82)

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**B** Backfit Requirements

Initials	Date
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**B** Backfit Guidance

Initials	Date
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## Qualification Guide 16 On The Job Training

PURPOSE. The purpose of this activity is to work with an experienced Project Manager to apply the knowledge gained from this qualification journal to actions associated with reference facilities.

### EVALUATION CRITERIA.

1. Fee Memos
2. Public Meeting
3. Site Visit
4. Receiving and Accepting a Licensing Action
5. Requesting Additional Information
6. Issuing a Final Licensing Action
7. Environmental Review
8. Hearing

### TASKS.

1. Fee Memos – Work with a PM to review and approve a set of fee memos.
2. Public Meeting
  - a. Schedule a public meeting and issue a meeting notice.
  - b. Help arrange and conduct the meeting.
  - c. Prepare and issue a meeting summary.



3. Site Visit

- a. Arrange a visit to a fuel facility.
- b. Process a Form 277 to transfer your security clearance to the site.
- c. Obtain an NRC dosimeter.
- d. Visit the site.
- e. Prepare and issue a trip report.

4. Receive and Accept a Licensing Action – Work with a PM to complete the tasks described in Qualification Guide 6.

5. Requesting Additional Information – Work with a PM to complete the tasks described in Qualification Guide 7.

6. Issuing a Final Action – Work with a PM to complete the tasks described in Qualification Guide 8.

7. Environmental Review – Work with a PM to complete an Environmental Assessment or an Environmental Impact Statement (see Qualification Guide 12).

8. Hearing – If possible, work with a PM to support a hearing.

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**C** Fee Memos

Initials	Date
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**C** Public Meeting

Initials	Date
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**C** Site Visit

Initials	Date
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**C** Receive and Accept an Action

Initials	Date
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**C** Request Additional Information

Initials	Date
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**C** Issue a Final Action

Initials	Date
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**C** Complete an Environmental Review

Initials	Date
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**C** Support a Hearing

Initials	Date
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## Qualification Guide 17 Specialized Training

PURPOSE. The purpose of this activity is to complete formal classes teaching skills and knowledge important to Project Manager functions.

### EVALUATION CRITERIA.

1. Site Access Training
2. Fuel Cycle Processes
3. Communications
4. Risk Training

### TASKS.

1. Site Access Training – Complete H100 or H101.
2. Fuel Cycle Processes – Complete F201 or F201S
3. Communications – Complete at least one of the following classes:
  - a. Technical Writing
  - b. Conducting Effective Public Meetings
  - c. Media Training Workshop
4. Risk Training – Complete at least one of the following classes:
  - a. Introduction to Risk Assessment in NMSS (P400 or P401)
  - b. Human Error Analysis/Human Reliability Analysis for NMSS (P406)

**SUPERVISOR APPROVAL:**

Basic = **B**, Intermediate = **I**, Comprehensive= **C**

**C** Site Access Training

Initials	Date
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**C** Fuel Cycle Processes

Initials	Date
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**C** Communications

Initials	Date
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**I** Risk Training

Initials	Date
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Attachment 1  
Revision History for IMC 1246, Appendix C2

Commitment Tracking Number	Document Accession Number and Issue Date	Description of Change	Training Needed	Training Completion Date	Comment Resolution Accession Number
N/A	ML102390432 11/15/10 CN 10-023	Completed 4 year historical CN search. Added new Qualification Journal for Fuel Cycle Project Managers.	None	N/A	ML102390433
N/A	ML11230B332 10/26/11 CN 11-022	Revision history sheet added. Combined Appendix A17 with Appendix B17 and renamed as Appendix C2. Added "training requirements" section from Appendix A17.	None	N/A	ML11235A759