IMC 1248, Appendix A

Materials Health Physics License Reviewer Qualification Journal

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Introduction

The U.S. Nuclear Regulatory Commission (NRC) Materials Health Physics License Reviewer (license reviewer) qualification program requires completion of a variety of activities designed to help you, the license reviewer candidate, learn information or practice skills important to independently performing this important function. When you have completed the entire qualification process, you will have demonstrated each of the competencies that describe a successful license reviewer. The role of a license reviewer is to implement NRC policy by determining if activities proposed in the license application can be performed safely and securely and in compliance with NRC regulations, using NRC guidance documents. The license reviewer's role is not to set policy in the areas of health and safety or security. A license reviewer should refer policy questions to management and the program office.

The Atomic Energy Act of 1954, as amended, gave authority to perform materials license reviews to the Office of Nuclear Materials Safety and Safeguards (NMSS), and the NMSS Director delegated licensing authority to the NMSS staff. For many years, licensing was only performed by headquarters staff in NMSS. In a memorandum dated October 6, 1987, the NMSS Director and the Executive Director for Operations delegated authority for performing certain license reviews to the regional administrators (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100830226). The regional administrators each redelegated authority for licensing to the directors of the regional divisions responsible for materials licensing, currently the Division of Nuclear Materials Safety (DNMS), and specified their requirements for further redelegation to the DNMS staff. In implementing Appendix A to Inspection Manual Chapter (IMC) 1248 for license reviewers, care should be taken to comply with the regional administrator's requirements as specified in the delegation of authority.

NOTE: In 2006 the Office of Federal and State Materials and Environmental Management Programs (FSME) took over the responsibility of managing the materials programs from NMSS.

A competent license reviewer should:

- a. Understand the legal basis and the processes used for achieving the NRC's regulatory objectives.
- b. Acquire a fundamental understanding of the NRC's organizational structure, mission, goals, and objectives.
- c. Understand the basis for the authority of the agency.
- d. Understand the processes established to achieve the regulatory objectives.
- e. Master the techniques and skills needed to collect, analyze, and integrate information using a safety and security focus to develop a supportable regulatory conclusion.

f. Have the personal and interpersonal skills to carry out assigned regulatory activities either individually or as a member of a team.

Program Organization

The license reviewer qualification process develops your awareness of the role of the agency, your role and skill as a license reviewer, and your technical expertise for reviewing licensing actions for the purposes of protecting health and safety and security. The final activity in the qualification process is to appear before a qualification board. Successful completion of the qualification board examination validates your understanding of the role of the agency, FSME programs, and your role as a license reviewer. Upon successful completion of all the activities in the qualification journal, including the qualification board, you become eligible to receive the *Materials Health Physics License Reviewer Qualification Certification*.

Qualification Journal Organization

The qualification journal identifies the training courses, the Individual Study Activities (ISAs), 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 license reviewer qualification requirements. The signature cards, certification, and equivalency justification pages form the permanent record of completing the license reviewer qualification program. These pages will be scanned and placed in your official personnel file.

Your immediate supervisor should consider assigning a qualified license reviewer 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.

Required Online Training Courses

These courses can be taken in any order:

- Computer Security Awareness
- OSHA Training; the curriculum is on iLearn under: "Occupational Health and Safety (IMC-1248)"
- Ethics Overview for Employees, as part of ISA-3
- Ethics Training for NRC Employees, as part of ISA-3
- Allegations Training, as part of ISA-5
- Annual Personally Identifiable Information (PII) Responsibilities, as part of ISA-14

- Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act), as part of ISA-16
- Agencywide Documents Access and Management System (ADAMS) Overview for NRC Staff, as part of ISA-18
- Information Security (INFOSEC) Awareness Training, as part of ISA-19

NOTE: It is your responsibility to meet your Region's and FSME's deadline for taking some of the above online self-study course work. Be aware that the list of online training courses may change in between revisions to this qualification journal.

Required Training Courses

- Licensing Practices and Procedures (G-109)
- Site Access Training (H-100) or Site Access Refresher Training (H-101)
- Diagnostic and Therapeutic Nuclear Medicine (H-304)
- Safety Aspects of Industrial Radiography (H-305)
- Transportation of Radioactive Materials (H-308)
- Brachytherapy, Gamma Knife, and Emerging Technologies Course (H-313)
- NRC Materials Control & Security Systems & Principles (S-201)
- Advanced Health Physics (H-201)

NOTE: Advanced Health Physics (H-201) is a challenging 2-week course that should not be taken unless the candidate has had previous health physics education and/or experience. The NRC offers two fundamental health physics courses (see Specialized Training Courses section below) that first should be considered: Fundamental Health Physics I and II (H-122), a 2-week course, and Fundamental Health Physics III (H-123), a 1-week course. The candidate's resource or mentor and/or immediate supervisor should be able to help determine which courses, if any, the candidate should take before enrolling in the Advanced Health Physics (H-201) course.

Human Resources Training and Development (HRTD) suggests candidates take the Advanced Health Physics (H-201) course as one of their last required courses. The H-201 course builds on the different concepts taught in the other training courses. HRTD believes that candidates will have a better understanding of health physics concepts and technology if they take the H-201 later in the qualification program.

The required training courses are the minimum courses you should take to complete the Materials Health Physics License Reviewer Qualification. Your immediate supervisor will determine the appropriate training courses you must take to complete the license reviewer qualification. For example, your immediate supervisor may require you to complete the Safety Aspects of Well Logging course (H-314) or the Irradiator Technology course (H-315) or both (see Specialized Training Courses below) if your region has a significant number of these licensees.

All Materials Health Physics License Reviewers involved with the materials security program must take S-201 or be able to demonstrate that they have the equivalent training or experience.

Immediate supervisors have the authority to waive any of the training based on the experience of the candidate seeking qualification as a license reviewer. Document the reason for the waiver on Form 1: Materials Health Physics License Reviewer Equivalency Justification. While your immediate supervisor may waive certain classes, your qualification still requires certification by your regional administrator, office director, or their designee.

If your management limited your training before your qualification because you would only be reviewing licenses in a limited field (e.g., the medical field), your license reviewer certification should clearly indicate this limitation.

Specialized Training Courses

- Inspection Procedures (G-108)
- Root Cause/Incident Investigation Workshop (G-205)
- Environmental Monitoring for Radioactivity (H-111)
- Air Sampling for Radioactive Materials (H-119)
- Multi-Agency Radiation Survey and Site Investigation (MARSSIM) (H-121)
- Multi-Agency Radiation Survey and Assessment of Materials and Equipment (MARSSAME) (H-120)
- Fundamental Health Physics I and II (H-122)
- Fundamental Health Physics III (H-123)
- Respiratory Protection (H-311)
- Internal Dosimetry and Whole Body Counting (H-312)
- Safety Aspects of Well Logging (H-314)

- Irradiator Technology Course (H-315)
- Health Physics Topics (H-401)
- RESRAD Training Workshop (H-410)
- RESRAD-OFFSITE Training Workshop (H-411)
- Visual Sampling Plan (H-500)
- Media Training Workshop

Additional courses may be developed after the publication of this qualification journal. Immediate supervisors may include these new specialized training courses in the qualification journals.

Refresher Training

Qualified license reviewers must maintain their qualification by completing 24 hours of refresher training in the established requalification cycle of 24 months. The beginning of each requalification cycle will be determined using the month and year the license reviewer completed his or her qualification. If the date the license reviewer completed his or her qualification is unknown, the immediate supervisor should establish a requalification cycle based on the best available information. The license reviewer's immediate supervisor may grant a 6-month extension, if for good reason, the license reviewer was unable to complete the required refresher training within the limits of the requalification cycle.

Refresher training may consist of either health and safety or security topics. The qualified license reviewer's immediate supervisor will determine the training courses the license reviewer needs and will coordinate with HRTD staff, as necessary, to obtain the needed training. Additionally, the supervisor can consult with HRTD staff to help identify specific courses that the staff member can take for refresher training. Examples of training that may be considered include: Health Physics Topics (H-401), NRC technical training courses, external training courses, attending lectures, developing presentations on subjects related to health and safety or security, directed self-study courses (identified in iLearn), or other training approved by the qualified license reviewer's immediate supervisor.

It is important to note that only taking a single course may not be enough refresher training. Completing the refresher training will depend on the number of hours that the qualified staff member has completed.

Before taking refresher training, license reviewers should receive approval from their immediate supervisor to confirm that the training will be credited as refresher training. The immediate supervisor should take into consideration the objectives of the training and determine whether the training will be beneficial to the license reviewer. When considering a self-study style of training, the immediate supervisor should determine whether the training is appropriately

structured. If the immediate supervisor is unsure if the self-study training is appropriate, he or she may want to consult with HRTD staff for its analysis of the training.

NOTE: License reviewers may retake a course they had taken previously. An immediate supervisor should consider whether it would be beneficial for the license reviewer to retake the course. An immediate supervisor should consider whether there have been changes in technology, regulations, or if the course has changed considerably since the last time the license reviewer took the course before allowing a course to be retaken as refresher training. If the immediate supervisor allows the license reviewer to retake the course, the license reviewer must complete and pass the exam, if the course has one, to receive credit for the course.

To receive credit and track the number of hours needed for refresher training for training offered outside of the NRC training catalog, the license reviewer and immediate supervisor should provide the course details (title of training, number of hours, etc.) to either his or her division training coordinator or the appropriate HRTD staff. The training coordinator or HRTD staff will enter the information into iLearn. If there is any concern about the content of the training, HRTD management and the qualified license reviewer's management will resolve the concern. The use of iLearn will assist license reviewers in keeping track of how many hours of refresher training they have completed within the requalification cycle.

NOTE: For staff who qualified under IMC 1246, the new refresher training requirements in IMC 1248 begin when IMC 1248 is issued. When making the transition between IMC 1246 and IMC 1248, staff will have an extension of up to 1 year to meet the new refresher training requirements.

Materials Health Physics License Reviewer Competencies

The training and qualification program detailed in this qualification journal ensures that every license reviewer 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)¹
- Understanding the basis for the authority of the agency (Regulatory Framework)
- Understanding the processes established to achieve the regulatory objectives (Regulatory Framework)

Area 2: Master 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 communications (Inspection)
- Evaluating licensing information by conducting an objective review (Licensing Activities)
- Determining acceptability of information by comparing to established criteria (Inspection and Licensing Activities)
- Objectively analyzing and integrating information using a safety 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, carefully listening, and speaking and writing with appropriate safety 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

Specific competency areas are listed in parenthesis following each item

challenging situations (Self-Management)

 Using technology to locate, gather, manipulate, and share information (Information Technology)

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 and how it relates to the license reviewer function. 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.

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

- The first four ISAs should be done first. Becoming familiar with the agency, the internal and external Web sites, your overall role as a license reviewer, and the NRC's safety culture are 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 other qualified license reviewers 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 tasks in each activity before meeting with your immediate supervisor for evaluation.

TOPIC: (ISA-1) History and Organization of the U.S. Nuclear Regulatory

Commission

PURPOSE: The purpos

The purpose of this activity is to familiarize you with the regulatory history of radioactive material 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.

COMPETENCY AREA:

REGULATORY FRAMEWORK

REFERENCES: 1. Title 10 of the *Code of Federal Regulations* (10 CFR)

- 2. NUREG-0980, "Nuclear Regulatory Legislation" (use the most current version available on the NRC Web site)
- 3. NUREG-1350, "Information Digest" (use the most current version available on the NRC Web site)
- 4. NUREG/BR-0175, "A Short History of Nuclear Regulation, 1946-2009," Revision 2, June 2010
- 5. Management Directive (MD) 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)"
- 6. MD 5.8, "Proposed Section 274b Agreements with States"
- 6. FSME Procedure BK-100: "Program Description Documentation," FSME external Web site at http://nrc-stp.ornl.gov/procedures.html

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:

- 1. Discuss the purpose of the Atomic Energy Act of 1954, as amended.
- 2. Discuss the major regulatory impacts of the Energy Reorganization Act of 1974, as amended.

- 3. Discuss the major regulatory impacts of the Energy Policy Act of 2005.
- 4. Discuss the roles and responsibilities and relationship between the regions and the FSME programs.
- 5. Discuss the relationship between the NRC and Agreement States (see ISA-8 for additional information).
- 6. Outline the major offices and briefly describe the functions of the Commission, the Office of the Inspector General, Office of the Secretary (SECY), the Atomic Safety and Licensing Board, the Advisory Committee on the Medical Uses of Isotopes, and Commission staff and program offices, including the Chief Financial Officer and Executive Director for Operations (OEDO).
- 7. Locate Commission-related documents and discuss how the Commission uses staff requirements memoranda to direct the staff.
- 8. Describe your Region's organization and key management positions.

TASKS:

- Obtain paper copies or locate electronic locations of the above-stated reference material for personal use and future reference. Some documents may be available through the regional Public Affairs Office. You can find electronic copies of documents on the NRC external Web site in the NRC Library.
- 2. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
- Read about the Commission's direction-setting and policymaking activities under Policymaking and understand the different kinds of decision documents that the Commission issues.
- 4. Review and discuss the evaluation criteria with your immediate supervisor.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-1.

TOPIC: (ISA-2) Navigating the NRC Internal and External Web Sites

PURPOSE: The purpose of this activity is to familiarize you with the NRC's internal and

external Web sites and to acquaint you with the information available. License reviewers must routinely review a variety of documents to support their licensing activities. Many of these documents are available electronically. This ISA will familiarize you with the Web locations of documents and information vital to your job. Thus, you will begin to build the knowledge you will need later to successfully perform your assigned

responsibilities.

COMPETENCY

AREA: INFORMATION TECHNOLOGY

REFERENCES: NRC internal and external Web sites

EVALUATION CRITERIA:

There are no specific evaluation criteria for this activity. Use your immediate supervisor or other agency personnel as a resource as you

complete this activity.

NOTE: Circumstances may result in some parts of the Web sites being unavailable at times. Also, be aware that some of the Web sites' titles or content may change. Please review the most recent version of the Web site. Complete as much as possible.

TASKS: Open your Web browser and do the following:

- 1. Explore the NRC's internal home page.
 - a. Locate the Ethics area.
 - i. Review the information available.
 - ii. Note the various sources of ethics advice.
 - b. Locate the Library Services area (NRC Technical Library) and review the information available.
 - i. Review the contents of the Online Catalog
 - ii. Review the content in Codes and Standards
 - c. Locate your Region's home page and review its functions.
 - Identify the Regional Administrator, NRC Regional Office.

- ii. Find and review the office organization and office instructions.
- d. Locate the FSME programs' home page and review the functions of this program office.
 - i. Identify the FSME Director.
 - ii. Find and review the office organization and office instructions.
- e. Locate the following offices' home pages and review the functions of the office:
 - i. Regional Offices
 - ii. Office of Nuclear Materials Safety and Safeguards
 - iii. Office of Enforcement
 - iv. Office of Nuclear Security and Incident Response
 - v. Office of International Programs
 - vi. Office of the General Counsel
 - vii. Office of Nuclear Reactor Regulation
 - viii. Office of New Reactors
 - ix. Office of Nuclear Regulatory Research
 - x. Office of Investigations
- f. Locate the Office of the Executive Director for Operations home page.
 - i. Review the OEDO's Communications Web site.
 - ii. Review guidance on Communication Tools and Plans.
 - iii. Review the Public Meeting Policy.
- g. Locate the SECY home page.
 - i. Review the functions of the office.
 - ii. Review the purpose of a SECY paper.
 - iii. Review the purpose of staff requirements memoranda.
- h. Locate the site for NRC management directives (MDs).
 - i. Find the MD dealing with the NRC Incident Investigation Program; review the purpose of the program.
 - ii. Find the MD dealing with the management of allegations; describe the general policy on disclosure of the identity of an alleger.
 - iii. Find the MD dealing with the NRC Medical Event Assessment Program; review the purpose of the program.
- i. Locate the agency's iLearn Web site.
 - i. Locate the course schedule and catalog, and browse the offerings for course availability.

- ii. Review how to enroll in a course.
- iii. Locate the Self-Paced Learning area
- iv. Find the Web-based allegation management training.
- v. Review the list of available Web-based learning opportunities.
- vi. Review the list of other available self-paced learning opportunities.

2. Explore the NRC's external (public) site.

- a. Go to the NRC Library.
 - i. Find the Glossary (Basic References).
 - ii. Find the NRC Inspection Manual (Collection of Documents).
 - iii. Find Regulatory Guides (RGs). Read about their purpose.
 - iv. Locate Generic Communications. Review the purpose of each of the types of generic communications documents.
 - v. Find NUREGs. Read about the different types of NUREG documents and determine how you can tell the difference.
 - vi. Find the NRC Regulations contained in 10 CFR. How many volumes comprise Title 10? What parts are applicable to the NRC?
 - vii. Use the search feature and search on radiation protection. View one of the documents to read about what a recent change to the CFR involved.
 - viii. View a part of the CFR. Look for the information that indicates when the regulation was issued and amended.
 - ix. Find and review the general purposes and procedures associated with the Privacy Act and the Freedom of Information Act (FOIA).
- b. Go to About NRC. Locate and review the rulemaking process under How We Regulate.
- c. Go to Nuclear Materials.
 - i. Review the information found under Byproduct
 Material
 - ii. Review the information found under Medical, Industrial & Academic Uses Current.
- d. Go to Nuclear Security.
 - i. Review the information found under Radioactive Material Security.

- ii. Review the information found in the Security Orders and Requirements.
- iii. Understand what the National Source Tracking System (NSTS) is and what it is used for.

Go to the FSME external Web site on the Agreement States http://nrc-stp.ornl.gov/ and review the information contained on this site. Go to the Organization of Agreement States Web site http://www.agreementstates.org/ and the Conference of Radiation Control Program Directors, Inc. http://www.crcpd.org/ and review these sites.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-2.

TOPIC: (ISA-3) Materials Health Physics License Reviewer Objectivity, Protocol,

and Professional Conduct

PURPOSE: The purpose of this activity is to acquaint you with the NRC's expectations

of a license reviewer's conduct and protocol. Professionalism is essential to the agency's ability to fulfill its mission of protecting public health and safety and security. A license reviewer's conduct is a vital component of the NRC's credibility as an effective regulator. As a license reviewer, 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 license reviewer conduct. This activity also will help you develop the professional conduct you will need to be an effective

NRC license reviewer.

COMPETENCY

AREAS: LICENSING ACTIVITIES

SELF-MANAGEMENT

REFERENCES: 1. MD 7.5, "Ethics Counseling and Training"

2. IMC 1201, "Conduct of Employees"

3. Regional guidance related to employee conduct

EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of proper NRC employee conduct during interactions with applicants or licensees 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
- 3. Explain the Office of Government Ethics standards of ethical conduct for the following areas, as applicable to NRC materials license reviewers:
 - 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 power
 - a. outside activities
- 2. Explain what NRC employees are supposed to do if they receive an allegation of improper action by an NRC staff member or contractor involved in oversight activities.

TASKS:

- Complete the Ethics Overview for Employees and Ethics Training for NRC Employees courses. To access the training, use the NRC's iLearn Web site. Be sure to print the completion record at the end of the online course in the event that completion of the course does not register in the iLearn system.
- 2. Locate and review the material specifically listed in the reference section of this activity. Although the agency has a code for employee conduct, not all regions have specific guidance in this area. You should closely review the guidance applicable to your position. Some of this guidance may be located in directives, which describe the duties and responsibilities of specific positions.
- Meet with your regional counsel or other 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.
- 4. Meet with your immediate supervisor, your regional counsel, or other 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 immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-3.

TOPIC: (ISA-4) 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 Web site, safety culture brochure, and case studies) that you should use for providing education and awareness of safety culture to the licensees. As a license reviewer, you should share key messages from the safety culture policy statement, Web site, brochure, and case studies with licensees during license reviews.

COMPETENCY

AREAS: SELF-MANAGEMENT COMMUNICATION

REFERENCES: 1. "Final Safety Culture Policy Statement," *Federal Register* Notice (76 FR 34773; June 14, 2011),

http://www.gpo.gov/fdsys/pkg/FR-2011-06-14/pdf/2011-14656.pdf;

also found at ADAMS Accession No. ML111650336

2. Safety Culture Web site: http://www.nrc.gov/about-nrc/regulatory/enforcement/safetyculture.html

- 3. "Safety Culture Policy Statement" brochure, ADAMS Accession No. ML11173A052
- 4. "Cultura de Seguridad Declaración de la política," ADAMS Accession No. ML11291A041
- 5. NRC-developed safety culture case studies: http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html#case
- 6. "Safety Culture Case Study User Guide." ADAMS Accession No. ML11195A352
- 7. Safety Culture Communication Plan Revision 1 ADAMS Accession No. ML11278A053

NOTE: Please note that the links above are subject to change and are provided for your convenience. You are responsible for locating the most current information.

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:

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

TASKS:

1. Explore information and guidance for the safety culture policy statement, Web site, brochure, and NRC-developed case studies on the identified Web sites or in ADAMS.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-4.

TOPIC: (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. While it is more common to receive allegation information during inspection, license reviewers must

still be alert to the receipt of allegations.

COMPETENCY AREAS:

LICENSING ACTIVITIES SELF-MANAGEMENT COMMUNICATION

REFERENCES: 1. MD 8.8, "Management of Allegations"

- 2. FSME Policy and Procedures (P&P) 8-4 "Management of Allegations and Agreement State Performance Concerns" (ADAMS Accession No. ML092540482)
- 3. NUREG/BR-0313, Revision 1, "Pre-Investigation Alternative Dispute Resolution Program"
- 4. NRC Form 613, "Disclosure of Alleger's Identity"
- 5. 10 CFR 30.9, "Completeness and Accuracy of Information"
- 6. 10 CFR 30.10, "Deliberate Misconduct"
- 7. Regional guidance on allegations
- 8. NUREG/BR-0240, "Reporting Safety Concerns to the NRC"
- 9. Office of Enforcement Web page

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:

- 1. State the criteria used to evaluate a statement to determine if the information in the statement is a potential allegation.
- 2. State the information required to be obtained during the receipt of a potential allegation.

- 3. State the role of the Office Allegation Coordinator (OAC).
- 4. State the purpose of, and the steps taken, to prepare an Allegation Review Board (ARB) briefing sheet.
- 5. State the information that should be provided to an ARB.
- 6. Discuss the criteria used to determine whether there is sufficient information to close an allegation.
- 7. State the purpose of, and the information needed to prepare, allegation closure documentation.
- 8. Discuss the proper handling of allegation material.
- 9. Discuss the NRC policy for protecting the identity of the Concerned Individual.
- 10. Describe the pre-investigation Alternative Dispute Program.

TASKS:

- 1. Review the applicable regulations and guidance listed in the reference section.
- Complete the Web-based Allegation Training module. To access the training, use the NRC's iLearn Web site. Be sure to print the completion record at the end of the online course in the event that completion of the course does not register in the iLearn system.
- 3. Review the applicable regional or office guidance for allegations.
- 4. Meet with the OAC and have him or her brief you on the allegation process and the OAC's role in the process.
- 5. As assigned by your immediate supervisor, review closed allegation case files (if possible, one should include a licensing issue) 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. Meet with the Office of Investigations (OI) for a briefing on deliberate behavior and willfulness. Discuss where inspection and licensing end and OI activities begin.
- 7. Discuss with your immediate supervisor or OAC the options available to the NRC to followup on an allegation and the circumstances when each is appropriate.
- Obtain the inspection results or licensee review information (or both)
 for a concern that has been referred. Discuss the precautions and
 limitations associated with referrals with your immediate supervisor
 or the OAC.
- 9. As assigned by your immediate supervisor, attend materials ARB meetings.
- 10. 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 alleger.
- 11. Meet with your immediate supervisor or the OAC to discuss any questions that you may have about this activity and to demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-5.

TOPIC: (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) the sanctions used in the Enforcement Program, and (3) 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

AREAS: REGULATORY FRAMEWORK

ENFORCEMENT

REFERENCES:

- Enforcement-related information found on the Enforcement Web page of the NRC public Web site, including the NRC enforcement policy, the enforcement manual, the Enforcement Program overview, the enforcement process diagram, and the alternative dispute resolution program.
- 2. Regional policy guide for enforcement.

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:

- 1. State the purpose of the NRC enforcement policy.
- 2. Describe the legal basis from which the NRC derives its enforcement authority.
- 3. Identify the burden of proof standard that the NRC uses in enforcement proceedings.
- 4. Identify the primary sanctions that the NRC uses in the Enforcement Program.
- 5. State the four issues that the NRC considers to assess the significance of a violation.
- 6. Define a minor violation and state the policy on documenting and correcting these violations.
- 7. Define Non-Cited Violation (NCV) and Notice of Violation (NOV).

- 8. Define escalated enforcement action.
- 9. Understand how to use the enforcement process diagram to disposition violations.
- 10. Describe what predecisional enforcement conferences and management conferences are and why, when, and with whom they are conducted.
- 11. Describe the Alternative Dispute Resolution (ADR) Program.
- 12. Discuss the purpose of civil penalties, when the NRC considers issuing them, and how the NRC determines the amount of penalties.
- 13. Recognize the purpose of the Confirmatory Action Letter (CAL) and when it is used.
- 14. Recognize the purpose of the different types of Orders and when they are used.
- 15. Discuss the purpose and use of Enforcement Guidance Memoranda (EGMs).
- 16. Describe how NRC Form 591 is used. Identify the types of violations that can and cannot be cited on the form.

TASKS:

- Locate the Enforcement Web page on the NRC public Web site.
 (Hint: Look under How We Regulate.)
- 2. Read the Enforcement Program overview included on the Enforcement Web page of the NRC external Web site.
- 3. Read the enforcement process diagram on the Enforcement Web page of the NRC external Web site.
- 4. Locate the enforcement policy on the Enforcement Web page of the NRC external Web site (look under Enforcement Guidance) and review the table of contents and appendices.
- 5. Locate the most recent escalated enforcement action for a materials licensee on the Enforcement Web page of the NRC external Web site. Review the transmittal letter and attached NOV.
- 6. Review your Region's guidance on implementing the enforcement policy.

- 7. Meet with the enforcement specialist in your Region to discuss the current enforcement guidance.
- 8. As assigned by your immediate supervisor, attend enforcement panels, predecisional enforcement conferences, and attend ADR sessions, if available.
- 9. 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 immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-6.

TOPIC: (ISA-7) The Office of Investigations

PURPOSE: The purpose of this activity is to familiarize you with the Office of

Investigations (OI). As a license reviewer, 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

AREAS: LICENSING ACTIVITIES

REGULATORY FRAMEWORK

REFERENCES: 1. MD 9.8, "Organization and Functions, Office of Investigations"

2. Regional OI Staff

3. OI Web page on the NRC external Web site

4. OI Web page on the NRC internal Web site

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:

- 1. State the function of OI.
- 2. Describe the organizational structure of OI.
- 3. Describe what your role would be in assisting OI.
- 4. Describe the authorities of an OI investigator.

TASKS: 1. Review MD 9.8

- 2. Study the OI Web page and associated organizational charts.
- 3. Meet with an experienced OI criminal investigator and discuss materials cases investigated by OI. Describe why it is important to investigate staff suspected of wrongdoing.
- 4. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-7.

TOPIC: (ISA-8) The Role of Agreement States in Radioactive Material Regulation

Under Section 274

PURPOSE: The purpose of this activity is to familiarize you with the role of the

Agreement States in the regulatory framework for radioactive material. During this activity, you will review Section 274 of the Atomic Energy Act and familiarize yourself with areas under which Agreement States assume regulatory responsibility for byproduct, source, and special nuclear

material and the NRC discontinues its authority.

This activity will introduce you to the oversight program that the NRC retains over the Agreement State programs and familiarize you with the regional or office points of contact that have been established for Agreement State agencies. This activity also will introduce you to the role of the two State organizations, the Organization of Agreement States (OAS) and the Conference of Radiation Control Program Directors (CRCPD), and their relationship with the NRC.

COMPETENCY AREA:

REGULATORY FRAMEWORK

REFERENCES:

- Section 274 of the Atomic Energy Act of 1954, as amended (Note: The Energy Policy Act of 2005, Public Law 109-58, Title VI, section 651(e)(2), 119 Stat. 807 (2005), revised the definition of byproduct material in Section 274b)
- 10 CFR Part 150, "Exemptions and Continued Regulatory Authority in Agreement States and in Offshore Waters under Section 274" (Note the unique requirements for uranium recovery programs in Agreement States)
- 3. "Statement of Principles and Policy for the Agreement State Program; Policy Statement on Adequacy and Compatibility of Agreement State Programs" (62 FR 465517; September 3, 1997)
- 4. "Criteria for Guidance of States and NRC in Discontinuance of NRC Regulatory Authority and Assumption Thereof by States Through Agreement" (46 FR 7540; January 23, 1981; as amended by policy statements published at 46 FR 36969; July 16, 1981; and 48 FR 33376; July 21, 1983)
- 5. MD 5.3, "Agreement State Participation in Working Groups"
- 6. MD 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)"
- 7. MD 5.7, "Technical Assistance to Agreement States"

- 8. MD 5.8, "Proposed Section 274b Agreements with States"
- 9. MD 5.9, "Adequacy and Compatibility of Agreement State Programs"
- "Topical Discussion of the NRC/Agreement State Program,"
 Organization of Agreement States, October 1994 (see FSME Web site at http://nrc-stp.ornl.gov/special/topical.pdf)
- 11. FSME external public Web site, include the external Web site on the Agreement States at http://nrc-stp.ornl.gov/
- 12. FSME Procedure SA-500, "Jurisdiction Determinations"
- 13. Organization of Agreement States Web site, http://www.agreementstates.org/
- 14. Conference of Radiation Control Program Directors, Inc., Web site, http://www.crcpd.org/

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the Agreement State program and the NRC oversight program by successfully doing the following:

- 1. Discuss the purpose of Section 274 of the Atomic Energy Act of 1954, as amended.
- Discuss the different categories of materials that Agreement States can assume regulatory authority over under a 274b agreement between the NRC and the State. Discuss the differences between a limited Agreement and a full Agreement.
- 3. Discuss the NRC's oversight program conducted under IMPEP.
- Describe the common and noncommon performance indicators used to evaluate Agreement State program (and NRC program) performance.
- 5. Describe what the finding of Adequacy and Compatibility means for an Agreement State.
- 6. Discuss the relationship and roles of:
 - a. The NRC and the individual Agreement States
 - b. The NRC and OAS
 - c. The NRC and CRCPD
 - d. OAS and CRCPD

- 7. Identify the Regional State Agreement Officers and describe their responsibilities. Describe the organizations within FSME with responsibility for the Agreement State program oversight and interactions.
- 8. Locate the last annual report to the Commission on the Agreement States' and the NRC's Radioactive Materials Program.

TASKS:

- Locate electronic locations of the above-stated reference material for personal use and future reference. You can find electronic copies of documents on the NRC's external Web site in the Electronic Reading Room and FSME external Web site.
- 2. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.
- 3. Read about the Agreement States and their role in the regulation of radioactive materials.
- 4. Meet with the Regional State Agreement Officer for your Region or a member of the Agreement State Program Branch, FSME, to discuss their roles and interactions with Agreement States.
- 5. Review and discuss the evaluation criteria with your immediate supervisor.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-8.

TOPIC: (ISA-9) Reciprocity

PURPOSE: The purpose of this activity is to familiarize you with the process for

granting reciprocity to Agreement State licensees for proposed licensed activities at temporary job sites located in Non-Agreement States, areas of

exclusive Federal jurisdiction, or offshore waters.

COMPETENCY

AREAS: COMMUNICATION SELF-MANAGEMENT

REGULATORY FRAMEWORK

REFERENCES: 1. 10 CFR 150.20, "Recognition of Agreement State Licenses"

2. IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"

3. IMC 1220, "Processing of NRC Form 241 and Inspection of Agreement State Licensees Operating under 10 CFR 150.20"

4. NUREG-1556, Volume 19, "Consolidated Guidance about Materials Licenses: Guidance for Agreement State Licensees about NRC Form 241 Report of Proposed Activities in Non-Agreement States, Areas of Exclusive Federal Jurisdiction, or Offshore Waters and Guidance for NRC Licensees Proposing to Work in Agreement State Jurisdiction (Reciprocity)"

EVALUATION CRITERIA:

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

- 1. Understand the NRC's process for granting reciprocity to Agreement State licensees wishing to conduct licensed activities at temporary job sites located in Non-Agreement States, areas of exclusive Federal jurisdiction, and offshore waters.
- 2. Identify the regulations that allow an Agreement State licensee to conduct licensed activities in Non-Agreement States, areas of exclusive Federal jurisdiction, or offshore waters.
- 3. Describe areas of exclusive Federal jurisdiction. Describe an area that may not be under exclusive Federal jurisdiction. Describe how you would make this determination.
- 4. Discuss why the filing of reciprocity is important to safety.

5. Discuss the regulatory and license requirements the Agreement State licensee is under while working in the Non-Agreement State, area of exclusive Federal jurisdiction, or offshore waters.

TASKS:

- 1. Review the documents referenced above.
- Meet with an individual experienced in your Region's processing of reciprocity requests and discuss the process. Discuss cases in which reciprocity was not given and why. Discuss the types of licensed activities conducted under reciprocity.
- 3. Under the supervision of the experienced individual, process reciprocity requests and describe why you approved the requests or why you did not approve the requests.
- 4. 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.
- 5. Schedule your participation in reciprocity inspections.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-9.

TOPIC: (ISA-10) NRC Interagency Agreements

PURPOSE: While performing licensing activities, license reviewers 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 agencies that outline how these issues should be addressed. The candidate should review ISA-8, "The Role of Agreement States in Radioactive Material Regulation Under Section 274," for information on the interface between the NRC and the States under Section 274 of the Atomic Energy Act.

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

COMPETENCY AREA:

REGULATORY FRAMEWORK

REFERENCES:

- IMC 1007, "Interfacing Activities between Regional Offices of NRC and OSHA"
- 2. MOU between the NRC and the Occupational Safety and Health Administration, dated October 31, 1988
- 3. MOU between the NRC and the Department of Justice, dated December 14, 1988
- 4. MOU between the NRC and the Department of Transportation, dated July 2, 1979
- 5. MOU between the NRC and the Department of Labor, dated December 3, 1982
- 6. Regional or 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 agencies.
- Explain, in general terms, how the NRC coordinates with other Federal agencies on matters not under the regulatory authority of the NRC.
- Explain the actions required by an NRC license reviewer when he or she identifies an occupational health and safety issue at a materials licensee's facility. Be able to state where the guidance for these actions is provided.
- 4. Identify who, in your Region or 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)

NOTE: The list of Federal agencies that the NRC coordinates with and has interagency agreements with may change. With your immediate supervisor, determine which agencies may interact with your organization.

There may not be an NRC point of contact for each Federal agency in your organization. The point of contact may be in another office.

TASKS:

- 1. Locate electronic versions of these documents on the NRC internal Web site under Office of Enforcement, Enforcement Program, and Enforcement Guidance.
- 2. Review the MOUs to develop a general understanding of the agreements between the NRC and OSHA, DOT, DOJ, and DOL.
- 3. Identify the designated liaison for those agencies and State agencies in your Region.
- 4. Meet with a qualified license reviewer, or the above liaison representative, to discuss licensing issues, if possible, that involved interaction with other Federal agencies. Discuss how the agency addressed the issues in the context of the applicable NRC MOU and office guidance.

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5. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-10.

TOPIC: (ISA-11) 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. Such communication supports one of the NRC's main objectives of increasing openness. This study activity will provide you information on implementation of the guidance on

contacts with the public and the media.

COMPETENCY

AREAS: COMMUNICATION SELF-MANAGEMENT

REGULATORY FRAMEWORK

REFERENCES:

- NUREG/BR-0215, Revision 2, "Public Involvement in the Nuclear Regulatory Process"
- 2. NUREG/BR-0202, "Guidelines for Interviews with the News Media"
- 3. NUREG/BR-0224, "Guidelines for Conducting Public Meetings"
- NUREG/BR-0297, "NRC Public Meetings"
- 5. MD 3.4, "Release of Information to the Public"
- 6. MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"
- 7. MD 8.11, "Review Process for 10 CFR 2.206 Petitions"
- 8. Public meeting checklist available at: http://www.internal.nrc.gov/communications/checklist.html
- Plain Language available at: http://www.internal.nrc.gov/NRC/PLAIN/index.html
- 10. Communication Plan guidance under "How Do I..." available at http://www.internal.nrc.gov/communications/
- 11. MD 12.6, "NRC Sensitive Unclassified Information Security Program"
- NRC Sensitive Unclassified Non-Safeguards Information(SUNSI) Web site: http://www.internal.nrc.gov/ois/divisions/irsd/sunsi/index.html

13. Regional 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)

NOTE: The links above are subject to change and are provided for your convenience. You are responsible for locating the most current information.

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:

- Describe what is meant by "Plain Language." Identify where guidance related to plain language and examples of plain language can be found.
- 2. Explain what a "2.206 petition" is. Describe how the NRC handles these petitions.
- 3. Define an NRC-sponsored public meeting.
- 4. Identify the different meeting categories and their purposes.
- 5. Identify what type of NRC meetings are generally open to the public. List some that are usually closed to the public.
- 6. Describe how members of the public can find out about NRC public meetings. Discuss the expectations on timeliness of meeting notices and summaries.
- 7. Describe the restrictions regarding the release of information to the public, including specific types of information not to be released.
- 8. Discuss the importance of communication with the public and the media. Specifically, effective communication means speaking clearly, accurately, and concisely; using plain English, avoiding technical jargon and acronyms; sticking to areas of expertise; using analogies and examples to help enhance understanding; never getting angry or combative or saying "no comment;" never going "off the record;" never giving opinions on policy; never speculating, or answering "what if" questions; and never guessing when you don't know the answers.
- 9. Discuss what a Communication Plan is and how it can affect you. Discuss what a Preliminary Notification (PN) is and when it is used to report an event.

10. Explain what information about the security of radioactive materials may be discussed with a member of the media or member of the public.

NOTE: You may request copies of the NUREG references used in this activity that cannot be found on the NRC external Web site from your public affairs office.

TASKS:

- 1. Review the references to understand the principles discussed in the evaluation criteria.
- 2. Visit the NRC's "Plain Language Action Plan" on the internal Web site, including some of the links to resource materials.
- 3. Visit the OEDO NRC Internal Web site and find the link to the Communication Web site. Review the public meeting policy and checklist.
- 4. If possible, attend a public meeting and observe the protocols used in the meeting.
- 5. Meet with an OPA representative and discuss the items listed in the Evaluation Criteria section.
- 6. Review the SUNSI requirements on the Web site or Management Directive and become familiar with the type of information that may not be shared with the public.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-11.

TOPIC: (ISA-12) Hearings

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

COMPETENCY

AREA: REGULATORY FRAMEWORK

REFERENCES: 1. 10 CFR Part 2, "Rules of Practice for Domestic Licensing

Procedures and Issuance of Orders," Subpart C, "Rules of General Applicability: Hearing Requests, Petitions to Intervene, Availability of Documents, Selection of Specific Hearing Procedures, Presiding Officer Powers, and General Hearing Management for NRC

Adjudicatory Hearings"

2. NRC adjudication Web site

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of the types of hearings, public involvement, and the hearing process.

- 1. Describe the types of hearings.
- 2. Describe public involvement in hearings.
- 3. Describe the hearing process.
- 4. State the types of office activities and processes that have hearings.
- 5. State the types of hearings, if any, which are required or could occur that affect your specialty area.

TASKS:

- 1. Review the references to understand the principles discussed in the evaluation criteria.
- 2. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-12.

TOPIC: (ISA-13) Proprietary Information and Determinations

PURPOSE: The purpose of this activity is to become familiar with requirements and

procedures for withholding proprietary information from public disclosure. In addition, all employees need to know how to handle proprietary

information.

COMPETENCY

AREA: LICENSING ACTIVITIES

REGULATORY FRAMEWORK

REFERENCES: 1. 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding"

2. MD 3.4, "Release of Information to the Public"

3. MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"

4. MD 12.6, "NRC Sensitive Unclassified Information Security Program"

NRC Sensitive Unclassified Non-Safeguards Information (SUNSI)
 Web site
 http://www.internal.nrc.gov/ois/divisions/irsd/sunsi/index.html

NOTE: Please note that the link above is subject to change and is provided for your convenience. You are responsible for locating the most current information.

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of proprietary information and the exceptions for withholding information, as well as an understanding of the NRC's SUNSI requirements.

- 1. Describe how to handle proprietary material in accordance with Agency requirements and procedures.
- 2. Describe the process for handling an incoming request to withhold materials stated to be proprietary from public disclosure.
- 3. Describe the process by which an entity may request to meet privately with the NRC staff to discuss proprietary matters.
- 4. Describe requirements on timeliness for making a proprietary determination.

5. Describe actions required in the event of an inadvertent release of proprietary information.

TASKS:

- 1. Review the references to understand the principles discussed in the evaluation criteria.
- 2. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-13.

TOPIC: (ISA-14) 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 the 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 how to implement the guidance on

responding to FOIA requests from the public.

COMPETENCY AREAS:

COMMUNICATION SELF-MANAGEMENT

REGULATORY FRAMEWORK

REFERENCES: 1. 10 CFR Part 9, "Public Records"

MD 3.1, "Freedom of Information Act"

3. MD 3.2, "Privacy Act"

4. SUNSI Web Site—Privacy Act/Personally Identifiable Information (PII): http://www.internal.nrc.gov/sunsi/

5. MD 3.4, "Release of Information to the Public"

6. Regional instructions establishing the policy and procedure for processing FOIA requests for agency records

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 addressing the following:

- Discuss the NRC goal of improving public confidence and how implementing the provisions of FOIA and the Privacy Act will contribute toward 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 withholdable 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, predecisional, 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.

TASKS:

- 1. Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.
- 2. Explore the information made available to the public on the NRC Web site and within ADAMS.
- 3. Complete the annual Personally Identifiable Information (PII)
 Responsibilities training. To access the training, use the NRC's
 iLearn Web site. Be sure to print the completion record at the end
 of the online course in the event that completion of the course does
 not register in the iLearn system.
- 4. Review the agency guidance on how to implement FOIA without releasing predecisional information and other information covered under the Privacy Act.
- 5. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-14.

TOPIC: (ISA-15) 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

REFERENCES: 1. Review the Generic Communications Program Web page at http://www.nrc.gov/about-nrc/regulatory/gencomms.html

- 2. IMC 0730, "Generic Communications Regarding Materials and Fuel Cycle Issues"
- 3. MD 8.18, "NRC Generic Communications Program"

NOTE: Please note that the link above is subject to change and is provided for your convenience. You are responsible for locating the most current information.

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.

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

TASKS:

- 1. Review the references to understand the principles discussed in the evaluation criteria.
- With your immediate supervisor, identify and review Information Notices (INs) and Regulatory Issue Summaries (RISs) pertinent to your position.
- 3. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-15.

TOPIC: (ISA-16) Differing Views Programs

PURPOSE: The purpose of this activity is to communicate expectations for establishing

and maintaining an open, collaborative working environment (OCWE) and to provide guidance on the informal and formal processes for pursuing resolution of differing views directly related to the NRC's mission. The NRC strives to establish and maintain an OCWE that encourages all employees and contractors to promptly voice differing views without fear of retaliation. At the NRC, we encourage trust, respect, and open communication to foster and promote a positive work environment that

communication to foster and promote a positive work environment that maximizes the potential of all individuals and improves our regulatory decisionmaking. We expect individuals to be NRC Team Players. In addition to informal discussions, which should be sufficient to resolve most issues, individuals have various mechanisms for expressing and having their differing views heard by decisionmakers, including the Open Door Policy, the Non-Concurrence Process (NCP), and the Differing

Professional Opinions (DPO) Program. This activity will provide you with an understanding of the expected behaviors for being an NRC Team Player who supports an OCWE and key features of the Open Door Policy,

the NCP, and the DPO Program.

COMPETENCY AREAS:

LICENSING ACTIVITIES SELF-MANAGEMENT COMMUNICATION

REFERENCES:

- 1. OCWE Web site:
 - http://www.internal.nrc.gov/OE/dva/index.html
- 2. NCP Web site: http://www.internal.nrc.gov/OE/nonconcur/index.html
- DPO Program Web site: http://www.internal.nrc.gov/OE/dpo/index.html
- 4. MD 10.160, "Open Door Policy"
- 5. Draft MD 10.158, "NRC Non-Concurrence Process"
- 6. MD 10.159, "The NRC Differing Professional Opinions Program"
- 7. Complete the annual No FEAR Act training. Access the training through the NRC's iLearn Web site. Be sure to print the completion record at the end of the online course in the event that completion of the course does not register in the iLearn system.

8. Review regional instructions establishing additional implementing guidance for raising differing views

NOTE: Please note that the links above are subject to change and are provided for your convenience. You are responsible for locating the most current information.

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC OCWE and the Ways to Raise Differing Views Program by successfully addressing the following:

- State the expectations for an OCWE and behaviors for being an NRC Team Player.
- 2. Describe the Open Door Policy.
- Describe the key features of the NCP.
- 4. Describe the key features of the DPO Program.
- 5. Discuss under which circumstances the various methods available for expressing differing views would be used.
- 6. Describe where summaries of closed DPOs are published and where DPO Program reviews are available.
- 7. Identify your Region's Differing Views Office Liaison.

TASKS:

- 1. Attend a seminar (if possible) on OCWE and the Ways to Raise Differing Views, or review seminar slides.
- 2. Explore information and guidance for OCWE, Open Door Policy, NCP, and the DPO Program on identified Web sites.
- 3. Review MD 10.160, draft MD 10.158, and MD 10.159.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-16.

TOPIC: (ISA-17) Overview of Title 10 of the Code of Federal Regulations

PURPOSE: The purpose of this activity is to acquaint you with the regulations that

specify the requirements for all aspects of the NRC, including the use of radioactive materials, disposal, fees, and the export and import of nuclear material and equipment. This ISA will help you to understand the

regulations and become familiar with specific requirements in the

regulations.

COMPETENCY

AREA: REGULATORY FRAMEWORK

REFERENCES: 1. The NRC internal home page

2. Paper copy of the latest revisions to 10 CFR Parts 1 through 50

3. Paper copy of the latest revisions to 10 CFR Parts 51 through 199

EVALUATION CRITERIA:

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:

- 1. State the purpose of 10 CFR Parts 1, 2, 9, 19, 20, 21, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 61, 70, 71, 73, 110, 150, 170, and 171.
- 2. Given a specific subject, identify which section in 10 CFR discusses the requirements for that subject.
- 3. Discuss the parts of the regulations identified as the focus area for your discipline.
- 4. Successfully answer the problems and questions about the regulations provided to you by your immediate supervisor. The problems and questions may be developed by your immediate supervisor or a qualified staff member assigned to assist you with qualification. Your immediate supervisor also may request self-study quizzes from HRTD through iLearn. The quizzes are located under the title, "General Radioactive Materials Overview of Title 10 of the *Code of Federal Regulations* (H-130S)."
- 5. Be able to discuss the difference between specific license of limited scope, specific license of broad scope, general license, and persons exempt from licensing.

TASKS:

- 1. Read and be familiar with the following parts of 10 CFR Part1, 2, 9, 19, 20, 21, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 61, 70, 71, 73, 110, 150, 170, and 171.
- 2. Identify with your immediate supervisor what parts of the regulations you should focus on during your review.
- 3. Answer the problems and questions about the regulations provided by your immediate supervisor and discuss your answers with your immediate supervisor and a senior technical staff member.

NOTE: After 10 CFR Part 37 "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material," is published, you should use the new regulations as a reference.

4. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-17.

TOPIC: (ISA-18) Agencywide Documents Access and Management System

(ADAMS)

PURPOSE: The Agencywide Documents Access and Management System (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 Web site 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

REFERENCES: 1. MD 3.53, "NRC Records and Document Management Program"

2. NUREG/BR-0273, "ADAMS Desk Reference Guide"

EVALUATION CRITERIA:

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

- 1. Describe the purpose of ADAMS.
- 2. Discuss how the agency uses ADAMS.
- 3. Discuss why it is important for a license reviewer to be familiar and proficient with ADAMS.
- 4. Describe the functions of ADAMS (i.e., searches, profiling, ML Accession Nos., and how to add documents).

TASKS:1. Using the iLearn Web site, sign up and complete the ADAMS Overview for NRC Staff.

- 2. Review MD 3.53, "NRC Records and Document Management Program."
- 3. Review NUREG/BR-0273, "ADAMS Desk Reference Guide."

- 4. Access ADAMS through the internal Web site and externally through the Internet to understand the informational limitations for the public.
- 5. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-18.

TOPIC: (ISA-19) Materials Security

PURPOSE: The purpose of this activity is to familiarize you with the security

requirements imposed on certain licensees as well as the pre-licensing process. This ISA will not make you a security expert, but it will provide you with a good understanding of the security requirements the NRC has in place. This activity also will require training on the appropriate handling

of sensitive information and information protection.

COMPETENCY

AREA: LICENSING ACTIVITIES

REFERENCES: 1. Pre-Licensing Guidance

- 2. Panoramic and Underwater Irradiator Orders
- 3. Manufacturers and Distributors (M&D) Orders
- 4. Transportation of Radioactive Materials Quantities of Concern (RAMQC) Orders
- 5. Increased Controls (IC) Orders
- 6. IC Toolbox and FAQs
- 7. 10 CFR 20.1801, "Security of Stored Material," and 10 CFR 20.1802, "Control of Material Not in Storage"
- 8. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- 9. 10 CFR Part 73, "Physical Protection of Plants and Materials"
- 10. Fingerprinting Orders for access to SGI and unescorted access to radioactive material and Fingerprinting FAQs
- NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."

NOTE: NRC Licensees have up to 1 year to implement the requirements in 10 CFR Part 37. The requirements in 10 CFR Part 37 will eventually supersede the Orders issued to enhance materials security.

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the Pre-Licensing Guidance, the different types of security requirements that the NRC imposes, know the thresholds for when licensees must implement the security requirements, and know how to protect certain types of information, including SUNSI and Safeguards Information (SGI):

- 1. Discuss the proper handling of SGI and SUNSI and how the NRC handles this type of information in ADAMS.
- Discuss the purposes for and the requirements in the Panoramic and Underwater Irradiator, M&D, RAMQC, IC, and Fingerprinting Orders (for access to SGI and unescorted access to radioactive material), as well as the thresholds at which a licensee must implement the requirements.
- 3. Discuss 10 CFR 20.1801, "Security of Stored Material," 10 CFR 20.1802, "Control of Material Not in Storage," and 10 CFR 30.34(i).
- 4. Discuss 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material.
- 5. Describe how the NRC uses its Pre-Licensing Guidance

TASKS:

- Complete the Information Security (INFOSEC) Awareness courses.
 To access the training, use the NRC's iLearn Web site. Be sure to print the completion record at the end of the online course in the event that completion of the course does not register in the iLearn system.
- 2. Review the instructions for handling SUNSI material available at: http://www.internal.nrc.gov/sunsi/
- 3. Review and become familiar with the NRC Pre-Licensing Guidance. Arrange to review an application for a new license under the supervision of a qualified license reviewer.
- Review the NRC Orders for Panoramic and Underwater Irradiators, M&D, RAMQC, ICs, and Fingerprinting (access to SGI and unescorted access to radioactive material) unless superseded by 10 CFR Part 37.

NOTE: As an NRC License Reviewer, you have been determined to be trustworthy and reliable. Access to SGI is limited to persons who are deemed to be trustworthy and reliable with a need to know. Your immediate supervisor will determine if you have a need to know based on your job duties.

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- 5. Gain access to the IC Toolbox (password protected) at http://nrc-stp.ornl.gov/controls.html.
- 6. 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.

NOTE: Please note that the links above are subject to change and are provided for your convenience. You are responsible for locating the most current information.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-19.

TOPIC: (ISA-20) Review of Significant Events at Material Licensees

PURPOSE: This ISA will help you become familiar with how the NRC handles events

related to radioactive material. You will also become familiar with the NRC's Nuclear Material Events Database (NMED) and the information in

the system.

COMPETENCY

AREA: LICENSING ACTIVITIES

REFERENCES: 1. NMED Web site: http://nmed.inl.gov/

- 2. MD 8.1, "Abnormal Occurrence Reporting Procedure"
- 3. MD 8.3, "NRC Incident Investigation Program"
- 4. MD 8.10, "NRC Medical Event Assessment Program"
- NMED Annual Reports
 (Hint: Use the drop down menu on the NMED Web site to access reports)
- 6. Review cases of events as directed by your immediate supervisor

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of how the NRC handles materials events (special inspections, Augmented Team Inspections, Integrated Team Inspections) and what information is stored in NMED.

- 1. Discuss the historical events reviewed, as well as the recommendations made, lessons learned, and the changes identified to prevent recurrences.
- 2. Describe the information included in the NMED Annual Reports.
- Describe and discuss the information stored in NMED and how the NRC uses it.
- 4. Describe the information included in the Abnormal Occurrence Annual Reports.

TASKS:1. Obtain an NMED login and password by following the instructions at: http://nmed.inl.gov/.

- 2. 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.
- 3. Review the most recent Abnormal Occurrence Report.
- 4. Review the most recent NMED Annual Report.
- 5. 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.

NOTE: Please note that the links above are subject to change and are provided for your convenience. You are responsible for locating the most current information.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-20

TOPIC: (ISA-21) Augmented Inspection Team, Special Inspection Team, and

Incident Inspection Team Activities

PURPOSE: The purpose of this activity is to familiarize you with the actions taken by

the NRC in response to incidents that do not require activation of the NRC Incident Response Plan. As a fully qualified license reviewer or inspector, you may be assigned to either an augmented inspection team (AIT), a special inspection team (SIT), or an incident inspection team (IIT) inspection activity. This individual study activity 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 an AIT, SIT, and IIT; and how this program differs from the NRC Incident Response

Program.

COMPETENCY AREA:

INSPECTION

REFERENCES: 1. MD 8.3, "NRC Incident Investigation Program"

2. IP 93800, "Augmented Inspection Team"

3. IP 93812, "Special Inspection"

4. IMC 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan"

5. MD 8.10, "NRC Medical Event Assessment Program"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC AIT, SIT, and IIT inspection activities by successfully addressing the following:

- 1. State the purpose of the NRC Incident Investigation Program.
- 2. Describe an AIT and its purpose.
- Describe an SIT and its purpose.
- 4. Describe an IIT and its purpose.
- 5. Describe how the Incident Investigation Program is different from the Incident Response Program.

TASKS: 1. Review MD 8.3, which you can find on the NRC internal Web site.

- 2. Explore all aspects of the Incident Investigation Program presented on the NRC internal Web site.
- 3. Review your region or office's guidance on AIT, SIT, and IIT activities.
- 4. Meet with your immediate supervisor or the person designated to be your resource for this activity to discuss the answers to the questions listed under the evaluation criteria.

DOCUMENTATION: Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-21

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TOPIC: (ISA-22) 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

REFERENCES:

- NRC internal Web page (Program Office to Nuclear Security and Incident Response (NSIR))
- 2. MD 8.2, "NRC Incident Response Program"
- 3. Regional Policy Guide for Emergency Response
- NUREG-0728, "NRC Incident Response Plan"
 http://www.nrc.gov/about-nrc/emerg-preparedness/respond-to-emerg/ml050970236.pdf (Note: This NUREG is revised periodically to reflect changes to the agency's activities. Be sure to obtain the most recent version.)

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the role of the agency and your Region or office in protecting public health and safety when responding to emergency situations at a nuclear facility by successfully addressing the following:

- Identify the types of emergency classifications and give examples of when the different classifications would be declared.
- 2. Identify the different modes of NRC emergency response and describe the purpose of each mode.
- 3. Discuss the capabilities (e.g., communications, information technology) provided in the Headquarters, regional, and onsite emergency response facilities.

- 4. Recognizing that these positions may not apply to all nuclear facilities and that the NRC will act with all available resources to respond to an emergency, identify the responsibilities of the following during a declared emergency event:
 - a. resident staff
 - b. Region-based staff
 - c. Headquarters staff
 - d. Headquarters operations officer
 - e. licensee
 - f. State and local officials
 - g. site team
 - h. base team
- 5. If you are onsite when an emergency is declared, explain the difference in your actions if the resident inspectors are or are not onsite.

TASKS:

- 1. Explore all aspects of the NSIR organization presented on the NRC's internal home page.
- 2. Review your Region or office's policy guidance on emergency response.
- 3. Review the NRC Incident Response Plan to address the evaluation criteria. Obtain a tour of your Incident Response Center.
- 4. Regional inspectors meet the incident response coordinator, tour the Incident Response Center, and, if possible, observe the Region'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 immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-22.

TOPIC: (ISA-23) Financial Assurance

PURPOSE: The purpose of this activity is to familiarize you with the procedures,

guidance, and activities applicable to approving material license financial

assurance and handling documents.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR 30.35, "Financial Assurance and Recordkeeping for Decommissioning"

- 2. Appendix A, "Criteria Relating to Use of Financial Tests and Parent Company Guarantees for Providing Reasonable Assurance of Funds for Decommissioning," to 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- Appendix C, "Criteria Relating to Use of Financial Tests and Self Guarantees for Providing Reasonable Assurance of Funds for Decommissioning," to 10 CFR Part 30
- Appendix D, "Criteria Relating to Use of Financial Tests and Self-Guarantee for Providing Reasonable Assurance of Funds for Decommissioning by Commercial Companies That have No Outstanding Rated Bonds," to 10 CFR Part 30
- Appendix E, "Criteria Relating to Use of Financial Tests and Self-Guarantee for Providing Reasonable Assurance of Funds for Decommissioning by Nonprofit Colleges, Universities, and Hospitals," to 10 CFR Part 30
- 6. 10 CFR 40.36, "Financial Assurance and Recordkeeping for Decommissioning"
- 10 CFR 70.25, "Financial Assurance and Recordkeeping for Decommissioning"
- 8. NUREG-1757, Volume 3, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness"
- 9. MD 8.12, "Decommissioning Financial Assurance Instrument Security Program"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of financial assurance requirements and processes by successfully addressing the following:

- 1. Why is it so important for a licensee to obtain and maintain financial assurance?
- 2. Describe the two types of documents that each licensee needs to submit to meet financial assurance.
- 3. Given the amounts and types of material on a license, determine the dollar amount of certification required or if a Decommissioning Funding Plan is required.
- 4. Describe the components of a licensee's Decommissioning Funding Plan.
- 5. How often is a licensee's Decommissioning Funding Plan required to be updated?
- 6. When does a licensee's Certification of Financial Assurance need to be revised?
- 7. Which financial assurance instruments need revision when a licensee is adding a new location of use to the license?
- 8. Describe the NRC's storage and handling criteria for original financial instruments.
- 9. Which financial instruments require a standby trust agreement?

TASKS:

- 1. Review the applicable regulations and guidance documents listed in the reference section.
- As assigned by your immediate supervisor, review completed financial assurance licensing actions. Actions should include a Decommissioning Funding Plan, a certified amount, an action with a Statement of Intent, an action with a letter of credit, and an action with a self or parent guarantee
- 3. Review a completed financial assurance action that required review of the annual test for a self or parent company guarantee.
- 4. Discuss with the Financial Assurance Instrument Custodian the process of storage and handling of original financial assurance instruments.

5. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-23.

TOPIC: (ISA-24) NUREG-1556, "Consolidated Guidance about Materials Licenses"

PURPOSE: The purpose of this activity is to familiarize you with the NUREG-1556

Series. The NUREG documents are program-specific guidance designed to be used by applicants, licensees, and NRC staff. Applicants and licensees use the NUREG volumes to prepare license applications, amendments, and other licensing actions. The NRC staff will use the NUREG volumes in its review of requests for licensing actions. In this ISA, you will review each volume and become familiar with the different types of

program-specific guidance available to licensees and NRC staff.

COMPETENCY

AREA: LICENSING ACTIVITIES REGULATORY FRAMEWORK

REFERENCES: 1. NUREG-1556 Series, "Consolidated Guidance about Materials

Licenses"

2. NUREG-1757, Volumes 1-3, "Consolidated Decommissioning

Guidance"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of the NUREG-1556 Series by successfully addressing the following:

- 1. Describe the purpose of the NUREG-1556 series.
- 2. Identify the different program-specific topics covered by the series and those not covered by the series (10 CFR Part 40, "Domestic Licensing of Source Material").
- 3. Describe the type of information found in the NUREG-1556 series.

NOTE: This ISA should be completed in conjunction with OJT-1 through OJT-15 of this appendix. It would be more beneficial to the candidate to become familiar with the NUREGs as they perform license reviews.

TASKS:

- 1. Obtain a paper copy of the NUREG-1556 series or locate the documents on the NRC Web site.
- 2. Read and familiarize yourself with the NUREG-1556 series.

- 3. Meet with and discuss the NUREG documents with subject-matter experts within your Region.
- 4. 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.
- Discuss the purpose of NUREG-1757, Volumes 1–3. Identify the limitation of someone with only a Materials Health Physics License Reviewer qualification when it comes to processing decommissioning licensing actions.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-24.

TOPIC: (ISA-25) Web-Based Licensing

PURPOSE: The Web-Based Licensing (WBL) System is a web-based software

solution developed to manage and support the information and processes

related to the licensing of radioactive materials.

COMPETENCY

AREA: INFORMATION TECHNOLOGY

REGULATORY FRAMEWORK

REFERENCES: 1. WBL web site: http://www.nrc.gov/security/byproduct/ismp/wbl.html

2. WBL Database: https://wbl.nrc-gateway.gov/

3. Web-Based Licensing (WBL) User Guide

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of WBL by successfully addressing the following:

- 1. Describe the purpose of WBL.
- 2. Discuss how the agency uses WBL.
- 3. Discuss why it is important for an inspector to be familiar and proficient with WBL.
- 4. Describe the functions of WBL (i.e., searches, adding inspection information, reports)

TASKS:

- Request a WBL account by contacting the WBL help desk at: WBLHelp.Resource@nrc.gov
- Review the WBL User Guide
- 3. Become familiar with using WBL
- 4. 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's signature in the line item for Qualification Journal Certification Signature Card Item ISA-25

Materials Health Physics License Reviewer On-the-Job Activities

The Appendix A on-the-job training (OJT) activities require you to perform license reviews, as assigned by your immediate supervisor, under the supervision of qualified materials license reviewers. Appendix A also requires that you perform some inspections, as assigned by your immediate supervisor, under the supervision of qualified inspectors. The belief is that you will be a better license reviewer if you are familiar with the inspection process. The OJT activities allow you to observe and perform key license reviewer and inspector tasks. Like the ISAs, each OJT activity tells you why the activity is important and what you are expected to complete successfully during the activity. The OJT activities do not specify that a particular number of supervised license reviews or number of inspection accompaniments need to be completed before the immediate supervisor considers you to be competent because numbers of completions don't always reflect competency. This is something only your immediate supervisor, assisted by the qualified license reviewers and qualified inspectors working with you, can determine.

There are many ways to qualify a candidate as a materials health physics license reviewer. Each Region will determine how they want this process to occur. One way is to qualify each candidate by individual program code. The candidate completes a number of actions in the particular program code demonstrating competency and the immediate supervisor recommends interim qualification to sign actions with that program code. This method has the benefit of getting the candidate some signature authority quickly; however, processing all of the management approvals can be inefficient and time consuming. A second method is one exhibited here in the Appendix A OJTs, in which program codes are grouped according to material types (byproduct, source, and special nuclear materials); material use (service, manufacturing, and distribution); material form (sealed source versus unsealed); relative program risk; and relevant regulation (10 CFR Part 33, "Specific Domestic Licenses of Broad Scope for Byproduct Material," and 10 CFR Part 35, "Medical Use of Byproduct Material"). There may be other factors to consider for grouping program codes. A candidate completes a number of actions in each program code group demonstrating competency and the immediate supervisor recommends interim qualification for the candidate to sign any action within that program code group. A downside of this method is all attempts to group program codes are imperfect. Exhibited here is one attempt to group program codes. Each Region can adjust to make its own groupings.

As you complete license reviews and inspections, you should complete the License Review Form and Inspection Form located at the end of this Appendix and ask the qualified license reviewers and qualified inspectors working with you to provide their comments. These forms will be used to track your progress as a license reviewer and an inspector.

Your immediate supervisor has the authority to waive any of the OJT modules by completing Form 1: Materials Health Physics License Reviewer Equivalency Justification, found at the end of this qualification journal.

Your Region may not have every category of program code discussed in the OJTs. In cases where there is not a certain category of license or very limited numbers such that it may not be possible for the candidate to complete the qualification journal in a reasonable period of time.

the immediate supervisor may decide whether the specific program code needs to be completed for the candidate to complete his or her qualification. Alternatively, an immediate supervisor can have a candidate conduct "license reviews" of previously completed casework. If an immediate supervisor decides to waive a certain program code, the immediate supervisor must document the reason for the waiver in the candidate's file.

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

- ✓ Complete all parts of each activity.
- Your immediate supervisor, qualified license reviewer, or qualified inspector will act as a resource 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. Your immediate supervisor will also designate other qualified license reviewers to work with you as you complete the various activities.
- 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, qualified license reviewer, or qualified inspector for evaluation.

Materials Health Physics License Reviewer On-the-Job Activity

TOPIC: (OJT-1) Industrial Radiography Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for industrial radiography licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES:

- 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 2. 10 CFR Part 34, "Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations"
- 3. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 4. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 5. 49 CFR, "Transportation"
- 6. Increased Controls Order
- 7. NUREG-1556, Volume 2, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Industrial Radiography Licenses"
- 8. NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 9. Sealed Source and Device Registry
- 10. National Source Tracking System

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC licensing process and demonstrate your ability to review license applications and submit requests for additional information:

1. Discuss the NRC's licensing process.

- Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information required in a specific license.

TASKS:

1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:

03310: Industrial Radiography – Fixed Locations03320: Industrial Radiography – Temporary Job Sites

03311: Industrial Diagnostic Systems

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.

- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-1.

TOPIC: (OJT-2) Industrial Measuring Systems (e.g., portable and fixed gauges,

gas chromatographs, analytical instruments); Civil Defense; Self-Shielded

Irradiators; and Panoramic Irradiator Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for industrial measuring systems, civil defense,

self-shielded irradiators, and panoramic irradiator licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

- 2. 10 CFR Part 36, "Licenses and Radiation Safety Requirements for Irradiators"
- 3. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- Increased Control Orders
- 5. Security Orders
- 6. NUREG-1556, Volume 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Portable Gauge Licenses"
- 7. NUREG-1556, Volume 4, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Fixed Gauge Licensees"
- 8. NUREG-1556, Volume 5, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Self-Shielded Irradiator Licenses"
- NUREG-1556, Volume 6, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about 10 CFR 36 Irradiator Licenses"
- NUREG-1556, Volume 7, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development, and Other Licenses of Limited Scope Including Gas Chromatographs and X-Ray Fluorescence Analyzers"

- 11. NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 12. Sealed Source and Device Registry
- 13. NSTS

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC licensing process and demonstrate your ability to review applications and submit requests for additional information:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information, if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

TASKS:

- As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 03120: Measuring Systems Fixed Gauges
 - 03121: Measuring Systems Portable Gauges
 - 03122: Measuring Systems Analytical Instruments
 - 03123: Measuring Systems Gas Chromatographs
 - 03124: Measuring Systems Other
 - 03130: Inspection Systems
 - 03510: Irradiators Self-Shielded Less Than 10.000 Curies
 - 03511: Irradiators Other Less Than 10,000 Curies
 - 03520: Irradiators Self-Shielded Greater Than 10,000 Curies

03521: Irradiators Other Greater Than 10,000 Curies

03710: Civil Defense

2. You will be responsible for the following:

- a. reviewing the licensee's initial application, license renewal, or amendment request
- b. developing the request for additional information
- c. evaluating the applicant or licensee's response to the request for additional information
- d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-2.

TOPIC: (OJT-3) Well Logging and Field Flooding Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for well logging and field flooding licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

- 2. 10 CFR Part 39, "Licenses and Radiation Safety Requirements for Well Logging"
- 3. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 4. 49 CFR, "Transportation"
- 5. Sealed Source and Device Registry
- 6. NUREG-1556, Volume 14, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Well Logging, Tracer, and Field Flood Study Licenses"

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.

- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

- As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 03110: Well Logging Byproduct and/or SNM Tracer and Sealed Sources
 - 03111: Well Logging Byproduct and/or SNM Sealed Sources Only
 - 03112: Well Logging Byproduct Only Tracers Only
 - 03113: Field Flooding Studies
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-3.

TOPIC: (OJT-4) Broad Scope (Nonmedical) Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for broad scope nonmedical licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

- 2. 10 CFR Part 33, "Specific Domestic Licenses of Broad Scope for Byproduct Material"
- 3. NUREG-1556, Volume 11, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Licenses of Broad Scope"
- 4. NUREG-1556, Volume 21, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Possession Licenses for Production of Radioactive Material Using an Accelerator"
- 5. Sealed Source and Device Registry
- 6. NSTS

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.

- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 01100: Academic Type A Broad
 01110: Academic Type B Broad
 01120: Academic Type C Broad
 03210: Byproduct Radionuclide Production using an Accelerator
 03211: Manufacturing and Distribution Type A Broad
 03212: Manufacturing and Distribution Type B Broad
 03213: Manufacturing and Distribution Type C Broad
 03235: Incineration non-commercial (secondary code)
 03610: Research and Development Type A Broad
 03611: Research and Development Type C Broad
 03612: Research and Development Type C Broad
 - 03613: Research and Development Multisite-Multiregional
- 2. You will be responsible for the following:
 - reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-4.

TOPIC: (OJT-5) Nuclear Pharmacy Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for nuclear pharmacy licensees possessing technetium-99m generators and for licensees possessing positron-emitting

radioactive material.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

- 2. 10 CFR Part 31, "General Domestic Licenses for Byproduct Material"
- 3. 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material"
- 4. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 5. 49 CFR, "Transportation"
- 6. NUREG-1556, Volume 13, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Commercial Radiopharmacy Licenses"
- 7. NUREG-1556, Volume 21, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Possession Licenses for Production of Radioactive Material Using an Accelerator"

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.

- 4. Discuss the security requirements imposed, if any, on the type of licensee in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete license reviews for the following program codes:

02500: Nuclear Pharmacies

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for this type of license will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the type of license in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-5.

TOPIC:

(OJT-6) Medical Licenses (including pacemakers, manual brachytherapy and programs covered under 10 CFR 35.1000, "Other Medical Uses of Byproduct Material or Radiation from Byproduct Material," but excluding programs of medical broad scope, high dose-rate (HDR) remote after loading brachytherapy, gamma knife, and teletherapy)

PURPOSE:

The purpose of this activity is to provide you with the skills needed to perform license reviews for medical licensees (including pacemakers, brachytherapy, and 10 CFR 35.1000 programs, excluding programs of medical broad scope, HDR, gamma knife and teletherapy.

COMPETENCY AREAS:

LICENSING ACTIVITIES

REFERENCES:

- 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 10 CFR Part 35, "Medical Use of Byproduct Material"
- 3. NUREG-1556, Volume 9, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Medical Use Licenses"
- 4. Sealed Source and Device Registry

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.

7. Discuss the information that is required in a specific license.

TASKS:

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 02120: Medical Institution written directive required
 - 02121: Medical Institution written directive not required
 - 02200: Medical Private Practice written directive required
 - 02201: Medical Private Practice written directive not required
 - 02210: Eye Applicators Strontium-90
 - 02220: Mobile Nuclear Medicine Service written directive not required
 - 02231 Mobile Medical Services written directive required (do only non-HDR modalities)
 - 22160: Pacemaker Byproduct and/or SNM Medical Institution
 - 22161: Pacemaker Byproduct and/or SNM Individual
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- Use the appropriate NUREG-1556 volume to assist you in your license review.
- 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-6.

TOPIC: (OJT-7) Other Medical Licenses (Teletherapy, HDR, and gamma knife)

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for other medical licensees, including teletherapy,

HDR, and gamma knife.

COMPETENCY AREAS:

LICENSING ACTIVITIES

REFERENCES:

- 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 10 CFR Part 35, "Medical Use of Byproduct Material"
- 3. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 4. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 5. NUREG-1556, Volume 9, "Consolidated Guidance about Materials Licenses: Program–Specific Guidance about Medical Use Licenses"
- NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 7. Sealed Source and Device Registry
- Increased Control Orders
- 9. NSTS

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.

- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.\
- 7. Discuss the information that is required in a specific license.

 As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:

02230: High Dose Rate Remote Afterloader

02231: Mobile Medical Services – written directive required (High

Dose Rate Remote Afterloader)

02240: Mobile Therapy – Other Emerging Technology

02300: Teletherapy

02310: Stereotactic Gamma Knife

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.

- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-7.

TOPIC: (OJT-8) Broad Scope Medical Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for broad scope medical licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES:

- 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 2. 10 CFR Part 33, "Specific Domestic Licenses of Broad Scope for Byproduct Material"
- 10 CFR Part 35, "Medical Use of Byproduct Material"
- 4. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- 5. NUREG-1556, Volume 9, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Medical Use Licenses"
- 6. NUREG-1556, Volume 11, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Licenses of Broad Scope"
- 7. NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 8. Sealed Source and Device Registry
- 9. Increased Control Orders
- 10. NSTS

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.

- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.

 As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:

02110: Medical Institution - Broad

03235: Incineration - noncommercial (secondary code)

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- Use the appropriate NUREG-1556 volume to assist you in your license review.
- 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-8.

TOPIC: (OJT-9) Research and Development (limited scope), Veterinary, Source

Material, In-Vitro Testing, Manufacturing (limited scope, including accelerator production), and Unsealed Special Nuclear Material (SNM)

Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for research and development, veterinary programs, source material, in-vitro testing, manufacturing and distribution

including accelerator production, and unsealed SNM licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

2. 10 CFR Part 40, "Domestic Licensing of Source Material"

3. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"

- 4. NUREG-1556, Volume 7, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development, and Other Licenses of Limited Scope Including Gas Chromatographs and X-Ray Fluorescence Analyzers"
- 5. NUREG-156, Volume 12, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Possession Licenses for Manufacturing and Distribution"
- 6. NUREG-1556, Volume 17, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Special Nuclear Material of Less Than Critical Mass Licenses"
- 7. NUREG-1556, Volume 21, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Possession Licenses for Production of Radioactive Material Using an Accelerator"
- 8. Sealed Source and Device Registry

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC licensing process and demonstrate your ability to review applications and submit requests for additional information:

1. Discuss the NRC's licensing process.

- Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 02400: Veterinary Non-Human Subjects
 - 02410: In-Vitro Testing Laboratory
 - 02700: Radium-226 Luminous Products & Sources up to 10 times 31.12(a)(4) and (a)(5)
 - 02710 Radium-226 Luminous Products & Sources Greater than 10 times 31.12(a)(4) and (a)(5)
 - 03214: Manufacturing and Distribution Other
 - 03215 Manufacture, Assembly, Disassembly, Repair of Products Containing Radium-226
 - 03620: Research and Development Other
 - 22110: SNM Plutonium Unsealed Less Than a Critical Mass
 - 22111: SNM U-235 and/or U-233 Less Than a Critical Mass
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-9.

TOPIC: (OJT-10) Distribution Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for distribution licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES:

- 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 2. 10 CFR Part 31, "General Domestic Licenses for Byproduct Material"
- 3. 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material"
- 4. 10 CFR Part 40, "Domestic Licensing of Source Material"
- 5. 10 CFR Part 70, Domestic Licensing of Special Nuclear Material"
- 6. NUREG-1556, Volume 13, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Commercial Radiopharmacy Licenses"
- NUREG-1556, Volume 16, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Licenses Authorizing Distribution to General Licensees"
- 8. NUREG-1556, Volume 17, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Licenses for Special Nuclear Material of Less than Critical Mass"
- 9. Sealed Source and Device Registry

EVALUATION CRITERIA:

- Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.

- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 02511: Medical Product Distribution 32.72 Prepared Pharmaceuticals
 - 02513: Medical Product Distribution 32.74 Sources and Devices
 - 03240: General License Distribution 32.51
 - 03241: General License Distribution 32.53
 - 03242: General License Distribution 32.57
 - 03243: General License Distribution 32.61
 - 03244: General License Distribution 32.71
 - 22162: Pacemaker Byproduct and/or SNM Manufacturing and Distribution
 - 22170: SNM General License Distribution
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-10.

TOPIC: (OJT-11) Sealed Special Nuclear Material and Byproduct Material Power

Sources Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for sealed special nuclear material and byproduct

material power sources licensees.

COMPETENCY AREAS:

LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 20, "Standards for Protection Against Radiation"

2. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

- 3. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"
- 4. NUREG-1556, Volume 17, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Licenses for Special Nuclear Material of Less than Critical Mass"
- 5. Sealed Source and Device Registry

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:

22120: PuBe sources

22130: Power Sources - Byproduct

22140: Plutonium – Sealed Sources in Devices

22150: Plutonium – Sealed Sources Less Than a Critical Mass22151: Uranium-235 and/or Uranium-233 Sealed Sources LessThan a Critical Mass

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-11.

TOPIC: (OJT-12) Source Material Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for source material licensees.

COMPETENCY

AREAS:

LICENSING ACTIVITIES

REFERENCES:

- 1. 10 CFR Part 20, "Standards for Protection Against Radiation"
- 2. 10 CFR Part 40, "Domestic Licensing of Source Material"
- 3. NUREG-1556, Volume 7, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Academic, Research and Development, and Other Licenses of Limited Scope Including Gas Chromatographs and X-Ray Fluorescence Analyzers"
- 4. Regulatory Guide (RG) 3.5, "Standard Format and Content of Licensing Applications for Uranium Mills"
- 5. RG 8.22, "Bioassay at Uranium Mills"
- 6. RG 8.30, "Health Physics Surveys in Uranium Recovery Facilities"
- 7. Policy and Guidance Directive 1-27, "Reviewing Requests to Convert Active Licenses to Possession-Only Licenses"
- 8. Sealed Source and Device Registry

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.
- 4. Discuss the security requirements imposed, if any, on source material licensees.

- 5. Understand the general licenses in 10 CFR 40.13, "Unimportant Quantities of Source Material," and 10 CFR 40.22, "Small Quantities of Source Material"
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:

03800:	Byproduct Material Possession Only
03810:	Byproduct Material Standby – No Operations
11200:	Source Material Other Less Than 150 Kilograms
11210:	Source Material Shielding
11220:	Source Material Military Munitions Indoor Testing
11221:	Source Material Military Munitions Outdoor Testing
11230:	Source Material General License Distribution – 40.34
11300:	Source Material Other Greater Than 150 Kilograms
11700:	Rare Earth Extraction and Processing
11800:	Source Material Possession Only
11810:	Source Material Standby – No Operations
23300:	SNM Possession Only – Other Than Reactor Fuel
23310:	SNM Possession Only – Other Than Reactor
	Fuel – No Operations

- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.

- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-12.

TOPIC: (OJT-13) Service Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for service licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES:

- 1. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 2. 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- 3. 10 CFR Part 40, "Domestic Licensing of Source Material"
- 4. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"
- 5. NUREG-1556, Volume 18, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Service Provider Licenses"
- NUREG-2155, "Implementation Guidance for 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material."
- 7. Security Orders
- 8. Sealed Source and Device Registry
- 9. NSTS

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the licensing actions you reviewed regarding the applicant or licensee's request, as well as the request for additional information, if necessary.
- 3. Describe how and in what instances you used the Pre-Licensing Guidance.

- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified reviewer, complete licensing actions for the following program codes:
 - 03218: Nuclear Laundry
 - 03219: Decontamination services 03220: Leak Test Service Only
 - 03221: Instrument Calibration Service Only, Source Less Than 100 Curies
 - 03222: Instrument Calibration Service Only, Source Greater Than 100 Curies
 - 03225: Other Services
 - 03226: Other Services, Source Greater than 100 Curies
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.

5. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-13.

TOPIC: (OJT-14) Decommissioning (Groups 1 and 2) Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for decommissioning licensees and to make sure you understand that the Materials Health Physics License Reviewer qualification limits you to performing decommissioning reviews for only Group 1 and Group 2 contaminated facilities. Decommissioning of

Group 3 though Group 7 facilities requires qualification as a

Decommissioning License Reviewer.

COMPETENCY AREAS:

LICENSING ACTIVITIES

REFERENCES:

- 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 2. 10 CFR Part 40, "Domestic Licensing of Source Material"
- 3. 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions"
- 4. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"
- 5. Appropriate NUREG-1556 volume
- NUREG-1757, Volumes 1–3, "Consolidated Decommissioning Guidance: Decommissioning Process for Materials Licenses; Characterization, Survey, and Determination of Radiological Criteria; and Financial Assurance, Recordkeeping, and Timeliness"
- 2002 Memorandum of Understanding between the Environmental Protection Agency and the Nuclear Regulatory Commission, "Consultation and Finality on Decommissioning and Decontamination of Contaminated Sites" available at http://www.nrc.gov/reading-rm/doc-collections/news/2002/mou2fin.pdf

EVALUATION CRITERIA:

- 1. Discuss the NRC's licensing process.
- 2. Discuss the difference between the different decommissioning Groups 1–7.

- 3. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request, as well as the request for additional information, if necessary.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Explain what information can be found in the Sealed Source and Device Registry and how it is helpful to license reviewers.
- 6. Discuss the process for requesting additional information from a licensee or applicant.
- 7. Discuss the information that is required in a specific license.

1. As assigned by your immediate supervisor, and under the supervision of a qualified license reviewer, complete licensing actions for the following program codes, Groups 1 and 2 only:

03900: Decommissioning of Byproduct Material Facilities
11900: Decommissioning of Source Material Facilities
22200: Decommissioning of Other SNM Material Facilities

- 2. Know the difference between Group 1 and Group 2 decommissioning.
- 3. What are Groups 3–7 decommissioning?
- 4. Know that the Materials Health Physics License Reviewer qualification limits you to Groups 1 and 2 decommissioning.
- 5. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 6. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 7. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 8. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-14.

Materials Health Physics License Reviewer On-the-Job Activity

TOPIC: (OJT-15) Waste Disposal Licenses

PURPOSE: The purpose of this activity is to provide you with the skills needed to

perform license reviews for waste disposal licensees.

COMPETENCY

AREAS: LICENSING ACTIVITIES

REFERENCES: 1. 10 CFR Part 20, "Standards for Protection Against Radiation"

- 2. 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- 3. 10 CFR Part 40, "Domestic Licensing of Source Material"
- 4. 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"
- 5. 10 CFR Part 62, "Criteria and Procedures for Emergency Access to Non-Federal and Regional Low-Level Waste Disposal Facilities"
- 6. 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material"
- 7. 10 CFR Part 71, "Packaging and Transportation of Radioactive Material"
- 8. Policy and Guidance Directive FC 84-21, "Incineration by Materials Licensees"
- 9. NUREG-1200, "Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility"
- 10. NUREG-1241, "Licensing of Alternative Methods of Disposal of Low-Level Radioactive Waste"
- 11. NUREG-1300, "Environmental Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility"
- 12. Appropriate NUREG-1556 volume
- 13. NUREG-1757, "Consolidated Decommissioning Guidance"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC licensing process and demonstrate your ability to review applications and submit requests for additional information:

- Discuss the NRC's licensing process.
- 2. Discuss the licensing actions that you reviewed regarding the applicant or licensee's request as well as the request for additional information if necessary.
- 3. Describe how and in what instances you used the pre-licensing guidance.
- 4. Discuss the security requirements imposed, if any, on the types of licensees in this module.
- 5. Discuss the process for requesting additional information from a licensee or applicant.
- 6. Discuss the information that is required in a specific license.

TASKS:

- 1. As assigned by your immediate supervisor, and under the supervision of a qualified license reviewer, complete licensing actions for the following program codes:
 - 03231: Waste Disposal (Burial)
 - 03232: Waste Disposal Service Prepackaged Only
 - 03233: Waste Disposal Service Incineration
 - 03234: Waste Disposal Service Processing and/or Repackaging
 - 03236: Waste Treatment Service
- 2. You will be responsible for the following:
 - a. reviewing the licensee's initial application, license renewal, or amendment request
 - b. developing the request for additional information
 - c. evaluating the applicant or licensee's response to the request for additional information
 - d. drafting or amending the specific license

NOTE: Your immediate supervisor and the qualified license reviewer assigned to work with you for these specific types of licenses will decide when you have demonstrated sufficient competency to recommend you for interim qualification status for signature authority for the different types of licenses in this module.

You are responsible for keeping track of license reviews that you work on.

- 3. Review NMED for any recent events involving the licensee for any potential generic issues and open items.
- 4. Use the appropriate NUREG-1556 volume to assist you in your license review.
- 5. Discuss the NRC's current policy for incineration of licensed radioactive material.
- 6. 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:

Complete the License Review Form for each license review you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-15.

Materials Health Physics License Reviewer Individual Study Activity

TOPIC: (ISA-16) Pre-Licensing Site Visits

PURPOSE: The purpose of this activity is to familiarize you with the

NRC's pre-licensing process and with the use of the Pre-Licensing Guidance. As a license reviewer, you may on occasion be called upon to

perform a pre-licensing visit to an applicant's facility to confirm the

legitimacy of the licensee and its planned activities.

COMPETENCY

AREA: LICENSING ACTIVITIES

REFERENCES: 1. NRC Pre-Licensing Guidance

 Government Accountability Office (GAO) Report, "Nuclear Security: Actions Taken by NRC to Strengthen Its Licensing Process for Sealed Radioactive Sources Are Not Effective," http://www.gao.gov/new.items/d071038t.pdf

NOTE: Please note that the link above is subject to change and is there for your convenience. You are responsible for locating the most current information.

EVALUATION CRITERIA.

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC's Pre-Licensing Guidance and be able to explain its purpose and how it is used as part of the licensing process:

- 1. Be able to explain how to use the screening criteria.
- 2. Discuss the purpose of the pre-licensing visit.
- 3. Discuss how to use the additional screening criteria.
- 4. Discuss the GAO's report on nuclear security.

TASKS:

- 1. Review and become familiar with the NRC Pre-Licensing Guidance.
- 2. Become familiar with the different steps involved in the guidance.
- 3. Learn where to obtain the necessary information needed for the additional screening criteria.

- 4. Become familiar with the GAO report and understand why pre-licensing guidance is such an important component to the security of radioactive materials.
- 5. As assigned by your immediate supervisor, perform a new license review with an experienced license reviewer and use appropriate licensing forms to make a pre-licensing site visit determination.
- 6. As assigned by your immediate supervisor, accompany an experienced license reviewer or inspector on pre-licensing site visits.

DOCUMENTATION:

Obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item ISA-16.

Materials Health Physicist License Reviewer On-the-Job Activity

TOPIC: (OJT-17) Inspection Accompaniments

PURPOSE: The purpose of this activity is to (1) acquaint you with the different types of

materials users, (2) familiarize you with the types of use of radioactive (3) familiarize you with the security requirements imposed on certain licensees, and (4) provide you with the opportunity to observe how inspectors use licensing documents issued by the Regions or

Headquarters to inspect materials licensees.

COMPETENCY AREAS:

INSPECTION

REFERENCES: 1. Licensee radioactive materials possession license

- 2. Appropriate IMCs and IPs
- 3. Previous inspection report
- 10 CFR Part 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material"
- Increased Control Order
- 6. Security Orders
- 7. Pre-Licensing Guidance

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the type of inspection conducted at the licensees' facilities as well as any type of security inspection conducted:

- 1. Identify the types of licensees inspected.
- 2. Describe how the inspector used the reference documents to conduct the inspection.
- 3. Describe how the inspections were conducted for the security requirements.
- 4. Explain the potential violations that were cited by the inspector. Explain why the licensee was cited.
- 5. Describe the focus of the pre-licensing site visit.

TASKS:

- 1. As assigned by your immediate supervisor, accompany a qualified inspector on the following:
 - Assist a qualified inspector with the performance of a variety of health and safety inspections; your immediate supervisor will determine the actual number and type of inspections
 - Assist a qualified inspector with the performance of security inspections of licensees possessing Category 1 or Category 2 radioactive material
 - c. Assist a qualified inspector or license reviewer on pre-licensing site visits.

NOTE: An individual who has already completed the requirements for the Materials Health Physics Inspector or is currently a qualified inspector may take credit for the training or the experience that they have had as an inspector as long as they have met the above minimum criteria.

You are responsible for keeping track of the inspections that you accompanied.

- Assist in the inspection preparation activities (i.e., collect background information as necessary; identify any follow up that may be required from previous inspections, or allegations)
- 3. Review NMED for any recent events involving the licensee as well as any potential generic issues and open items.
- 4. Locate and review the IPs that will be used during the inspection.
- 5. Become familiar with the scope of the inspection.
- 6. Participate in the entrance and exit interviews with the licensee.
- 7. Participate in the interviews of the applicant's or licensee's personnel.
- 8. Become familiar with the documentation of inspection results discussed in IMC 2800, "Materials Inspection Program."
- 9. Assist the inspector in developing the inspection report following the appropriate IMC.

10. 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:

Complete the Inspection Accompaniment Form for each inspection accompaniment you perform and obtain your immediate supervisor's signature in the line item for Qualification Journal Certification Signature Card Item OJT-17.

Materials Health Physics License Reviewer Signature Cards and Certification

Materials Health Physics License Reviewer's Name:	Employee Initials/Date	Immediate Supervisor's Signature/Date				
A. Required and Specialized Training (title and course number)						
Training: Licensing Practices and Procedures (G-109)						
Training: Site Access Training (H-100) or Site Access Refresher Training (H-101)						
Training: Diagnostic and Therapeutic Nuclear Medicine (H-304)						
Training: Safety Aspects of Industrial Radiography (H-305)						
Training: Transportation of Radioactive Materials (H-308)						
Training: Brachytherapy, Gamma Knife, and Emerging Technologies Course (H-313)						
Training: NRC Materials Control & Security Systems & Principles (S-201)						
Training: Advanced Health Physics (H-201)						
Training:						
Training:						
Training:						
Training:						
Training:						
Training:						
B. Individual Study Activities	L					
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission						
ISA-2 Navigating the NRC's Internal and External Web Sites						
ISA-3 Materials Health Physics License Reviewer Objectivity, Protocol, and Professional Conduct						
ISA-4 Safety Culture						
ISA-5 Allegations						
ISA-6 The Enforcement Program						
ISA-7 The Office of Investigations						

Materials Health Physics License Reviewer's Name:	Employee Initials/Date	Immediate Supervisor's Signature/Date
ISA-8 The Role of Agreement States in Radioactive Material Regulation Under Section 274		
ISA-9 Reciprocity		
ISA-10 NRC Interagency Agreements		
ISA-11 Interactions with the Public and the Media		
ISA-12 Hearings		
ISA-13 Proprietary Information and Determinations		
ISA-14 The Freedom of Information Act and the Privacy Act		
ISA-15 Generic Communications		
ISA-16 Differing Views Programs		
ISA-17 Overview of Title 10 of the Code of Federal Regulations		
ISA-18 Agencywide Documents Access and Management System (ADAMS)		
ISA-19 Materials Security		
ISA-20 Review of Significant Events at Material Licensees		
ISA-21 Augmented Inspection Team, Special Inspection Team, and Integrated Investigation Team Activities		
ISA-22 NRC's Response to an Emergency at a Nuclear Facility		
ISA-23 Financial Assurance		
ISA-24 NUREG-1556, "Consolidated Guidance About Materials Licenses"		
ISA-25 Web-Based Licensing		
C. On-the-Job Training Activities		
OJT-1 Industrial Radiography Licenses		
OJT-2 Industrial Measuring Systems; Civil Defense; Self-Shielded Irradiator; and Panoramic Irradiator		
OJT-3 Well Logging and Field Flooding Licenses		
OJT-4 Broad Scope (Nonmedical) Licenses		
OJT-5 Nuclear Pharmacy Licenses		

Materials Health Physics License Reviewer's Name:	Employee	Immediate
	Initials/Date	Supervisor's
		Signature/Date
OJT-6 Medical Licenses		
OJT-7 Other Medical Licenses		
OJT-8 Broad Scope Medical Licenses		
OJT-9 Research & Development; Manufacturing and		
Unsealed Special Nuclear Material Licenses		
OJT-10 Distribution Licenses		
OJT-11 Sealed Special Nuclear Material and Byproduct		
Material Power Sources Licenses		
OJT-12 Source Material Licenses		
OJT-13 Service Licenses		
OJT-14 Decommissioning Licenses		
OJT-15 Waste Disposal Licenses		
OJT-16 Pre-Licensing Site Visits		
OJT-17 Inspection Accompaniments		

This signature card and certification must be accompanied by the appropriate Form 1. Materials License Reviewer Equivalency Justification, if applicable.

Materials Health Physics License Reviewer Certification
(name) has successfully completed all of the requirements to be certified as a
MATERIALS HEALTH PHYSICS LICENSE REVIEWER
has successfully completed all of the requirements to be certified as a MATERIALS HEALTH PHYSICS LICENSE

Date:_____

Immediate Supervisor Signature_____

Form 1: Materials Health Physics L Equivalency Justificat	
Materials Health Physics License Reviewer's Name:	Identify equivalent training and experience for which the materials health physics license reviewer is to be given credit.
A. Required and Specialized Training (title and cour	se number)
Training: Licensing Practices and Procedures (G-109)	
Training: Site Access Training (H-100) or Site	
Access Refresher Training (H-101)	
Training: Diagnostic and Therapeutic Nuclear Medicine (H-304)	
Training: Safety Aspects of Industrial Radiography (H-305)	
Training: Transportation of Radioactive Materials (H-308)	
Training: Brachytherapy, Gamma Knife, and Emerging Technologies Course (H-313)	
Training: NRC Materials Control & Security Systems & Principles (S-201)	
Training: Advanced Health Physics (H-201)	
Training:	
Training:	
Training:	
B. Individual Study Activities	
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission	
ISA-2 Navigating the NRC's Internal and External Web	
ISA-3 Materials Health Physics License Reviewer	
Objectivity, Protocol, and Professional Conduct	
ISA-4 Safety Culture	
ISA-5 Allegations	
ISA-6 The Enforcement Program	
ISA-7 The Office of Investigations	
ISA-8 The Role of Agreement States in Radioactive Material Regulation Under Section 274	
ISA-9 Reciprocity	
ISA-10 NRC Interagency Agreements	
ISA-11 Interactions with the Public and the Media	
ISA-12 Hearings	
ISA-13 Proprietary Information and Determinations	
ISA-14 The Freedom of Information Act and the Privacy Act	

Materia	ls Health Physics License Reviewer's Name:	Identify equivalent training and experience for which the materials health physics license reviewer is to be given credit.
ISA-15	Generic Communications	
ISA-16	Differing Views Programs	
ISA-17	Overview of Title 10 of the Code of Federal Regulations	
ISA-18	Agencywide Documents Access and Management	
ISA-19	Materials Security	
ISA-20	Review of Significant Events at Material Licensees	
ISA-21	Augmented Inspection Team, Special Inspection Team, and Incident Inspection Team Activities	
	NRC's Response to an Emergency at a Nuclear Facility	
ISA-23	Financial Assurance	
ISA-24	NUREG-1556, "Consolidated Guidance About Materials Licensees"	
ISA-25	Web-Based Licensing	
C. On-	the-Job Training Activities	
OJT-1	Industrial Radiography Licenses	
	Industrial Measuring Systems; Civil Defense; Self-Shielded Irradiators; and Panoramic Irradiator Licenses	
OJT-3	Well Logging and Field Flooding Licenses	
OJT-4	Broad Scope: (Nonmedical) Licenses	
	Nuclear Pharmacy Licenses	
	Medical Licenses	
	Other Medical Licenses	
	Broad Scope Medical Licenses	
	Research and Development; Manufacturing and Unsealed Special Nuclear Material Licenses	
	Distribution Licenses	
	Sealed Special Nuclear Material and Byproduct Material Power Sources Licenses	
OJT-12	Source Material Licenses	

Materials Health Physics License Reviewer's I	Vame: Identify equivalent training and experience for which the materials health physics license reviewer is to be given credit.
OJT-13 Service Licenses	
OJT-14 Decommissioning Licenses	
OJT-15 Waste Disposal Licenses	
OJT-16 Pre-Licensing Site Visits	
OJT-17 Inspection Accompaniments	
Immediate Supervisor's Recommendation S	ignature/Date
Division Director's Approval	Signature/Date

LICENSE REVIEW COMPLETION FORM

Qualification Card #:				
Licensee Name:				
License No.:				
Docket No.:				
Mail Control No.:				
Program Code(s):				
Action Type:	NEW	AMENDMENT	RENEWAL	TERMINATION
Amendment No.:				
Scope of Licensing Action:				
Deficiencies and Other Issues:				
Candidate Reviewer Signature:				
Qualified Reviewer Signature:				
COMMENTS:				

INSPECTION COMPLETION FORM

Qualification Card #:			
Licensee Name:			
License No.:			
Docket No.:			
Program Code(s):			
Inspection Type:	Initial Routine	Special	Pre-Licensing
		Security	non-security
Inspection Date:			
Program Scope:			
Findings:			
Candidate Inspector Signature:			
Qualified Inspector Signature:			
COMMENTS:			

Attachment 1

Revision History Table for IMC 1248, Appendix A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution Accession Number
N/A	ML112350968 10/26/11 CN 11-022	Revision history sheet added. Combined Appendix A1 with Appendix B1 and renamed as IMC 1246 Appendix E1. Added "Training Requirements" Section from Appendix A1	N/A	ML112350982
N/A	ML12240A131 04/19/13 CN 13-011	Has been renamed from IMC 1246 App E01 to IMC 1248 App A. and was created to remove and separate FSME activities from IMC 1246 Appendix E1 NMSS manual chapter series. The qualification journal was completely revised to accommodate this change and include specific FSME information (i.e. the security of radioactive materials).	N/A	ML12254B095