

NRC INSPECTION MANUAL

DFM

INSPECTION MANUAL CHAPTER 1246 APPENDIX B2

TRAINING REQUIREMENTS AND QUALIFICATION JOURNAL FOR
STORAGE AND TRANSPORTATION INSPECTOR

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INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) inspector qualification program requires completion of activities designed to develop or enhance skills relevant to performing the job of an inspector. Candidate inspectors should complete the qualification process and demonstrate the competencies of a storage and transportation (SAT) inspector.

This SAT inspector Qualification Journal of the Office of Nuclear Material Safety and Safeguards (NMSS), Division of Fuel Management (DFM), implements the NRC Inspection Manual Chapter (IMC) 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area," Appendix B2, by establishing the minimum training requirements for a staff member qualifying as an SAT inspector. This qualification journal is managed by the Office of Nuclear Material Safety and Safeguards (NMSS), Division of Fuel Management (DFM), Inspections and Oversight Branch (IOB).

A staff member completing this Qualification Journal should be able to understand the following:

1. The NRC organizational structure and regulatory objectives, as well as the basis for the authority of the agency
2. The technology and application of concepts in various technical areas related to the design, construction, and operation of an ISFSI and transportation packagings to allow the NRC to carry out its overall responsibilities in the following way:
 - a. Understand science and engineering fundamentals related to basic SAT quality assurance, design, fabrication, and operations to protect the public health and safety and the environment.
 - b. Use technical knowledge of SAT, quality assurance, design, fabrication, and operation to identify, address, and resolve regulatory issues.
3. The techniques and skills needed to collect, analyze, and integrate information using a safety focus to develop a supportable regulatory conclusion by doing the following:
 - a. Independently gather information through objective review, observation, and open communications.
 - b. Determine the acceptability of information by comparing to established regulatory criteria.
 - c. Respond to events or conditions involving a potential or actual adverse safety consequence.
 - d. Approach problems objectively, gather and integrate information, and develop a comprehensive understanding before reaching a conclusion.
 - e. Objectively analyze and integrate information using a safety focus to identify the appropriate regulatory conclusion and regulatory response.

The qualifying individual should also be able to develop personal and interpersonal skills necessary to carry out assigned regulatory activities, either individually or as part of a team. The required training should prepare the staff to clearly express ideas or thoughts, but also to carefully listen, speak, and write with an appropriate safety focus and context. The staff should

be able to work collaboratively with others or independently during difficult or challenging situations in order to achieve a common goal, the safe operation of SAT.

PROGRAM ORGANIZATION

The SAT Inspector Qualification Journal establishes the minimum training requirements consistent with IMC 1246. The Qualification Journal must provide traceable documentation to show that each SAT inspector has met minimum requirements. The employee's supervisor has the discretion to modify the requirements, as needed, based on the employee's previous experience, education, and course availability. The employee's supervisor may add, delete, or substitute with other material for training course(s) that will not be available during the qualification period. For exceptions to the SAT inspector qualification process (e.g., grandfathering and individuals qualified under other NRC divisions), refer to section 8, "Exceptions," of IMC 1246. Refer to form A-2 and B-2 of this appendix for equivalency justifications to each Training/ISA/OJT. In addition, the journal also contains forms that the candidate inspector will complete to document the justification for accepting equivalent training or experience as a means of meeting an inspector qualification requirement.

The inspector qualification process is divided into two levels: (1) Basic Level and (2) Technical Proficiency Level.

The Basic-Level activities are designed to help the candidate inspector develop awareness of the agency's role and the inspector's role. Successfully completing the basic-level work will provide the candidate with a context for meaningful learning during onsite work and a foundation for in-depth learning at the Technical Proficiency Level. Once the basic level activities have been fully completed, the inspector is determined to be basic level qualified and may perform inspection under the direction of a qualified inspector.

The Technical Proficiency activities are designed to develop the technical expertise through the review of SAT licensing, quality assurance, design, construction, and operational activities. These two levels of the SAT Inspector Qualification Journal consist of a series of independent study activities (ISAs) and on-the-job training (OJT) activities. Each ISA and OJT is used to document task completion, as indicated by the appropriate signature block(s).

An optional additional supplement to the Technical Proficiency has been included to provide a means for SAT inspectors to also perform independent spent fuel storage installation (ISFSI) inspections normally performed by regional inspectors without regional inspector accompaniment. If SAT inspectors perform regional ISFSI inspections without regional inspector accompaniment, they should also complete this optional supplement.

With a Basic Inspector Certification, received by completing Part A of this qualification, the individual may be assigned to perform limited scope inspection activities under an appropriate degree of detailed supervision so that all recently acquired skill sets can be applied. The scope of the assigned inspection activities will be controlled by the immediate supervisor. A Basic qualified individual can be asked to conduct inspection activities, but will not be expected to independently reach conclusions, describe official agency positions on evolving issues, or act as an official agency spokesperson. The emphasis in the inspector qualification program is to develop competencies so inspectors can evaluate information, analyze data, and apply NRC rules and regulations efficiently and effectively. Time may be charged to the licensee for work performed by the individual.

DISCUSSION

This DFM Qualification Journal contains a qualification summary sheet and signature cards. The supervisor should discuss the scope of this SAT Inspector Qualification Journal and expected knowledge level, as described later in this journal, with the inspector in training before the qualification process. Usually, the candidate's immediate supervisor signs the material completed during the qualification process begins. The candidate's supervisor may also delegate this responsibility to a qualified inspector as needed. The inspector in training is expected to complete all ISAs and OJTs. At the supervisor's discretion, requirements may be deleted or added, depending on the candidate inspector's previous experience, and shall be documented in the form found in Forms A-2 and B-2 to this Qualification Journal.

The inspector in training is expected to use the current version or revision of each document cited in this Qualification Journal. Most of the documentation is readily available on either the (1) NRC's internal Web site, (2) NRC's Agencywide Documents Access and Management System (ADAMS), or (3) regional library.

Some of the required formal training courses may not be immediately available. The supervisor may substitute an alternative course, or substitute another method to meet the requirement, or delete the requirement altogether. Any such change should be documented in this Qualification Journal and justified in the form found in Forms A-2 and B-2 to this Qualification Journal.

The time necessary to complete this DFM Qualification Journal will vary, depending on the candidate's previous experience and education, but management expects completion within 24 months. However, the availability of required training courses and the candidate inspector's assigned workload may also prolong the time period, which should be approved by the candidate's immediate supervisor.

QUALIFICATION BOARD CERTIFICATION

IMC 1246, section 08, "Oral Qualification Board," provides guidance for Board members to use in conducting the oral qualification. Additional guidance provided below explains how to document possible Board outcomes.

Upon approval from the Division Director, the oral board may be waived based on previous qualification.

Board Recommendations

The Board will document the results of its assessment, in writing, to the Division Director, each time a Board examines an individual, as follows:

- a. If the Board's assessment is favorable, the recommendation will be to grant Full Qualification. Any areas where additional review is required (lookup items) must be completed by the individual and verified by an assigned member of the Board before the Board forwards its decision to the Division Director.
- b. If the Board has identified areas of weakness requiring formal remediation, the Board will identify the areas for improvement in writing and recommend that the individual appear before a Board for reexamination when the remediation activities are complete. The Board and the individual's supervisor will agree on a schedule for reexamination.
- c. If the Board has identified performance deficiencies that could not be (in the Board's opinion), or cannot likely be, successfully addressed with a thorough remediation effort, the Board will document the full scope of the deficiencies and recommend that the individual not be remediated or reexamined.
- d. A copy of each Qualification Board's results, identifying any weaknesses and deficiencies, will be placed in the individual's personnel file. The individual will receive a copy of the Board's findings and recommendation.

Reexamination Board: A Reexamination Board must include at least one individual from the original Board. The Board questioning during reexamination will focus on the areas of identified weakness.

Board Documentation: The Board's decisions are forwarded to the Division Director for information. The form on the following page shall be used to document the Board's decision.

Part A: Basic-Level Training and Qualification Journal

PART I. BASIC-LEVEL INDIVIDUAL STUDY ACTIVITIES

The individual study activities (ISAs) are designed to direct and focus your efforts as you begin reviewing documents that will be important to the performance of your job. Each study activity begins with a purpose statement explaining why the activity is important and how it relates to the job of an inspector. The level of effort has been noted so that you have an idea of how much effort should be expended in completing the activity. (The amount of time is an estimate.) The evaluation criteria are listed up front to allow you to review them first and better understand the expectations when you are completing the activity. The evaluation criteria should help you to focus on the relevant information. The tasks outline the process to successfully understand the information required to complete the ISA.

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

- Complete the first two ISAs first. Becoming familiar with the agency and the overall role of an inspector is important for successfully completing the remaining activities. You should also become familiar with the content of the remaining activities, which will allow you to complete the activities as opportunities arise.
- Your immediate supervisor or a qualified inspector, as designated by your immediate supervisor, will act as a resource to assist you in completing each activity and signing off the qualification journal requirements as you complete the material. You should discuss the material in the ISA with your immediate supervisor or designated resource.
- 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 supervisor or designee for evaluation.

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

PURPOSE:

The purpose of this activity is to familiarize you with the regulatory history of the commercial nuclear industry and the evolution of the regulatory framework under which the staff of today's U.S. Nuclear Regulatory Commission (NRC) functions. During this activity, you will review the organization of the agency and its staff and the relationships between the major offices.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. Title 10 of the *Code of Federal Regulations* (10 CFR)
2. NUREG-1350, "Information Digest," (NUREGS are in the Document Collections section of the NRC Library on the public Web page, select the latest edition)
3. NUREG/BR-0175, "A Short History of Nuclear Regulations," Revision 2, October 2010
4. NRC External Webpage About NRC (<https://www.nrc.gov/about-nrc.html>)
5. TMS Course: "The NRC: An Agency Overview"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate an understanding of the agency's regulatory history and development of the commercial applications of nuclear energy 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. Outline the major offices (and regions) and briefly describe the functioning of the Commission, the Office of the Inspector General, Office of the Secretary, the Atomic Safety and Licensing Board, the Advisory Committee on Reactor Safeguards, and Commission staff and program offices, including the Chief Financial Officer and Executive Director for Operations.
4. Describe the Regions' and offices' organization, as well as key management positions.
5. Discuss the relationship between the NRC and the U.S. Department of Energy (DOE).
6. Describe the organization and the function and types of issues that each branch deals within the Division of Spent Fuel Management (DFM).

TASKS:

1. Obtain paper or electronic copies of the above-listed 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 Electronic Reading Room.
2. Review the reference material to gain an understanding of the items discussed in the evaluation criteria.
3. Review and discuss the evaluation criteria with your supervisor or designee.

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

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

PURPOSE:

The purpose of this activity is to acquaint you with the NRC's expectations of inspector conduct and protocol. Professionalism is essential to the agency's ability to fulfill its goals of protecting public health and safety. Inspector conduct is a vital component of the NRC's credibility as an effective regulator. As a qualified inspector, you will often be representing the agency in interactions with licensee management and workers, local officials, media, and the public. This ISA will help you to understand NRC procedures, policies, and expectations related to inspector conduct. This activity will also help you to develop the professional conduct that you will need to be an effective NRC inspector.

COMPETENCY AREA: INSPECTION
SELF-MANAGEMENT

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NRC Inspection Manual Chapter (IMC) 0102, "Oversight and Objectivity of Inspectors and Examiners at Reactor Facilities"
2. TMS Training: Ethics Training for New NRC Employees
3. Management Directive (MD) 7.5, "Ethics Counseling and Training"
4. IMC 1201, "Conduct of Employees"
5. IMC 2515 section 12.06, "Witnessing Unsafe Situations"
6. MD 8.17 "Licensee Complaints Against NRC Employees"
7. The Ethics page of OGC's Internal Website (<https://intranet.nrc.gov/ogc/nrc-ethics>)
8. Regional or office guidance related to inspector/employee conduct

EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you will be asked to demonstrate your understanding of proper NRC inspector conduct during inspections at nuclear facilities by successfully addressing the following:

1. What is expected 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, credit unions
 - d. property and neighborhood relationships
 - e. community activities
 - f. employment of spouse and children
3. Explain the Office of Government Ethics (<https://www.oge.gov>) standards of ethical conduct for the following areas as applicable to NRC inspectors:
- 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
 - g. outside activities
4. What actions are NRC personnel expected to perform when they identify unsafe work practices or violations that could lead to an unsafe situation?
5. What are some of the techniques used by NRC managers to verify the performance and objectivity of individual inspectors and team leaders during onsite activities at reactor facilities? Your answer should include discussion of the specific areas that NRC management should focus on in assessing inspectors.
6. What are the expectations of inspector conduct in a reactor control room during normal, transient, and emergency conditions?
7. What are NRC employees supposed to do if they receive an allegation of improper action by an NRC staff member or contractor involved in inspection or other oversight activities?

TASKS:

1. Complete the ethics training. To access the training, go to TMS and search "Ethics." Select "Ethics Training for New NRC Employees." Be sure to print the completion record at the end of the course. You must present evidence to your supervisor of the completion of this training course.
2. Locate and review the material specifically listed in the reference section of this activity. Although the agency has a code for employee/inspector conduct, not all regions or offices have specific guidance in this area. You should closely review the guidance applicable to your position.
3. Meet with the regional or office counsel or other designated ethics expert and discuss applications of ethics to your role as an NRC employee and any questions you may have as a result of this activity. You should demonstrate understanding of the guidance by explaining the answers to the first three questions listed in the evaluation criteria section of this activity.
4. Discuss the items listed under the evaluation criteria section of this study activity with your immediate supervisor or designee.

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

(ISA-3) Fitness-for-Duty Rule

PURPOSE:

The purpose of this activity is to provide you with an understanding of the fitness-for-duty (FFD) rule. Nuclear power plants and certain other NRC licensees are required to have FFD programs, which include drug and alcohol testing procedures and other measures to ensure that the licensee staff is capable of operating the facilities safely.

Note: Research and test reactors are not subject to 10 CFR Part 26, "Fitness for Duty Programs," but according to 10 CFR 55.53(j), each licensed operator is required to meet FFD performance standards, and according to 10 CFR 55.53(k), each licensed operator "...shall participate in any drug and alcohol testing program that may be established for that non-power facility."

COMPETENCY AREA: INSPECTION
SELF-MANAGEMENT

LEVEL OF EFFORT: 3 hours

REFERENCES:

1. Enforcement Manual, Part II, section 2.4, "Enforcement Actions Involving Fitness-For-Duty (FFD)"
2. 10 CFR Part 26, "Fitness for Duty Programs"
3. SECY 00-0022, "Rulemaking Plan, 'Decrease in the Scope of Random Fitness-for-Duty Testing Requirements for Nuclear Power Reactor Licensees,' for Amendments to 10 CFR Part 26"
4. NUREG-1912, "Summary and Analysis of Public Comments Received on Proposed Revisions to 10 CFR Part 26 – "Fitness for Duty Programs" section 4.2, "Performance Objectives," and section 4.4.3, "Procedures"

EVALUATION CRITERIA:

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

1. State the purpose of the NRC's FFD rule and which licensees are required to meet this rule.
2. Explain why the FFD rule (10 CFR Part 26) is not considered an "unwarranted" invasion of privacy and how licensees implement the requirements.
3. Discuss the enforcement policy related to violations of the FFD rule as shown in the enforcement manual.

4. Answer the following questions related to FFD. To whom does the FFD rule apply? Can a licensee deny access to an NRC inspector whom it suspects has been drinking? If not, what can the licensee do? What are the reporting requirements associated with FFD violations committed by licensed operators, supervisory personnel, and maintenance technicians?

TASKS:

1. On the NRC's external Web site, use the search function to find information on FFD. Explore all aspects of the FFD rule and drug testing program guidance.
2. Open 10 CFR Part 26 and read the table of contents. Understand the Purpose, Scope, and FFD Program Applicability.
3. Be familiar with the purpose and scope of the references listed in this section.
4. Have a discussion with a Security Inspector about the FFD Rule.
5. Meet with your immediate supervisor, or the person designated to be the new employee resource for this activity, to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-3.

(ISA-4) Allegations

PURPOSE:

The purpose of this activity is to familiarize the candidate with the procedures, guidance, and activities applicable to handling the receipt, processing, review, and closure of allegations. This study activity will help you to effectively interact with individuals bringing concerns to the NRC and to appropriately respond to those concerns.

COMPETENCY AREAS: INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 20 hours

REFERENCES:

1. MD 8.8, "Management of Allegations"
2. Allegation Manual
3. NRC Form 613, "Allegation Program Identity Protection Policy," available in the Forms Library at: <https://usnrc.sharepoint.com/teams/NRC-Forms-Library/SitePages/Home.aspx>
4. 10 CFR 50.5, 10 CFR 71.8, 10 CFR 72.12, "Deliberate Misconduct"
5. 10 CFR 50.7, 10 CFR 71.9, 10 CFR 72.10, "Employee Protection"
6. 10 CFR 50.9, 10 CFR 71.7, 10 CFR 72.11, "Completeness and Accuracy of Information"
7. Regional or office guidance on allegations
8. NUREG/BR-0240, "Reporting Safety Concerns to the NRC"
9. Office of Enforcement Web page
10. TMS Training: "Allegations Process" and "Allegations Intake and Routing"

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to show 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 that is 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 as well as who is required to be on the ARB.
6. Describe the allegation evaluation methods that may be directed by the ARB and discuss what information is needed to close the allegation for each approach.
7. State the purpose of, and the information needed to prepare, allegation closure documentation.
8. Explain what an Ad-Hoc/Emergency ARB is an when it is used.

TASKS:

1. Review the applicable regulations and guidance listed in the reference section including Exhibit 1 of the Allegation Manual.
2. Complete the two TMS training modules listed in the Resources section of this ISA. Individuals who are assigned to a Regional office, may also have to take focused allegation training that was developed based, in part, upon lessons-learned. If you are assigned to a Regional office consult your supervisor for details regarding the need to complete such training.
3. Review the applicable regional or office guidance for allegations.
4. Review two closed allegation case files (if possible, one should include an inspection effort):
5. Identify how incoming correspondence or information was determined to meet the definition of an allegation and how specific concerns were identified.
 - a. Review the associated ARB briefing sheets, particularly the determination of safety significance and the proposed action plan.
 - b. Review the associated allegation closeout memorandum or closeout letter to understand the rationale and basis for an allegation closeout.
6. Obtain the inspection results and/or licensee review information for a concern that has been referred. Discuss the precautions and limitations associated with referrals with your supervisor or the OAC.
7. Coordinate a meeting with the OAC to discuss the allegation process and the OAC's role in the process.
8. Discuss with your immediate supervisor or OAC the options available to the NRC to follow up an allegation and the circumstances when each option is appropriate.
9. Attend two ARB meetings.

10. Work 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 and issues.
- b. Discuss with your supervisor or OAC a proposed plan to resolve the simulated allegation.
- c. Obtain the inspection and/or investigation results; compare the results to the original concerns. Discuss with your immediate supervisor or the OAC how the inspection results addressed the concerns. Discuss whether the allegation concerns were substantiated and how you would respond to the allegor.

11. Meet with your immediate supervisor or the OAC to discuss any questions that you may have as a result of this activity and to demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-4.

(ISA-5) NRC's Response to an Incident at a Nuclear Facility

PURPOSE:

The purpose of this activity is to acquaint you with the actions taken by the NRC in response to an emergency that may occur at a nuclear facility. Incident Response (IR) is vital to the agency, fulfilling one of its primary mandates of protecting the health and safety of the public. As a fully qualified inspector, you will be trained to perform specific IR activities. This ISA will help you to understand how the NRC meets its IR mandate and will begin to build the knowledge that you will need later to successfully meet IR responsibilities.

COMPETENCY AREAS: INCIDENT RESPONSE

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. NRC internal Web page (Program Office>Nuclear Security and Incident Response (NSIR))
2. MD 8.2, "NRC Incident Response Program"
3. Regional policy guide for emergency response
4. Incident Response Manual Chapter 200, "Incident Response Plan"
5. Inspection Procedure (IP) 71153, attachment 2, "Limiting NRC Impact During Events"
6. TMS Training: General Response Training (Web based)
7. TMS Training: ICS 100 Introduction to the Incident Command System (Web based)
8. TMS Training: IS-700 An Introduction to the National Incident Management System (Web based)

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:

1. Identify the types of emergency classifications and give examples of when the different classifications would be declared.
2. Describe the differences in capabilities and functions between the NRC Incident Response Program when it is activated and when it is not. Describe the process by which the NRC activates the response program.

3. Discuss the capabilities (e.g., communications, information technology) provided in the Headquarters, regional, and onsite and offsite emergency response facilities.
4. Identify the responsibilities of the following during an activation of the NRC's IR Program:
 - a. Response Director
 - b. Senior Agency Representative to the Licensee/Unified Coordination Group
 - c. Public Information Team
 - d. Liaison Team
 - e. Operations Section Chief
 - f. Reactor Safety Group
 - g. Protective Measures Group
 - h. Security Group
 - i. Planning Section
 - j. Logistics Section
 - k. Headquarters Operations Officers
5. If you are on site when an emergency is declared, explain the difference in your actions if the resident inspectors are on site or if they are not on site. Describe the protocol for limiting unnecessary impact on licensee activities during an event.
6. Describe the roles of the state and licensee emergency response facilities, such as the Technical Support Center (TSC), Alternate TSC, Operations Support Center, Emergency Operations Facility, Joint Information Center, and State Emergency Operations Center. Describe the role of the Main Control Room during emergencies.

TASKS:

1. Review your region or office's policy guidance on incident response.
2. Review the NRC Incident Response Plan (IRMC 200) in order to address the evaluation criteria.
3. Complete the TMS courses listed within the Reference section.
4. Inspectors should meet the incident response coordinator, tour the incident response center, and if possible, observe the NRC's response during a drill or event.
5. Meet with your supervisor or the person designated to be your resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-5.

(ISA-6) Enforcement Program

PURPOSE:

The purpose of this activity is to provide an overview of the NRC enforcement program. This ISA will assist you in learning and understanding the following: (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 will also provide you with an understanding of the information and guidance resources available concerning the enforcement program.

COMPETENCY AREA: REGULATORY FRAMEWORK
ENFORCEMENT

LEVEL OF EFFORT: 17 hours

REFERENCES:

1. Enforcement-related information found on the Enforcement Web page of the NRC public Web site, including the enforcement program overview and the enforcement process diagram (<https://www.nrc.gov/about-nrc/regulatory/enforcement.html>)
2. The Enforcement Policy
3. The Enforcement Manual
4. "Writing Violations" course in TMS
5. Regional policy guide for enforcement

EVALUATION CRITERIA:

Upon completion of the tasks in this activity, you should show your understanding of the agency's enforcement program by successfully completing the following:

1. State the purpose of the NRC enforcement policy.
2. Identify the burden of proof standard that the NRC uses in enforcement proceedings.
3. Identify the primary sanctions that the NRC uses in the enforcement program.
4. State the four issues that the NRC considers in assessing the significance of a violation.
5. Describe the two types of significance categorization outcomes.
6. Define "minor violation" and state the policy on documenting and correcting these violations.
7. Define "non-cited violation."

8. Define “escalated enforcement action.”
9. Understand how to use the enforcement process diagram to disposition violations.
10. Describe pre-decisional enforcement conferences and regulatory conferences and explain why, when, and with whom these are conducted.
11. Discuss the purpose of civil penalties, when the NRC considers issuing them, and how the NRC determines the amount of penalties.
12. Recognize the purpose of the different types of Orders and when these are used.
13. Be able to explain the enforcement process from the moment an apparent violation is identified up until the violation is dispositioned.

TASKS:

1. Locate the Enforcement Web page on the NRC public Web site. (Hint: Look under “About Us, 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 manual on the Enforcement Web page of the NRC external Web site (look under “Enforcement Guidance”) and review the table of contents and appendices.
5. Read the memorandum from the Director, Office of Enforcement, titled “Dispositioning of Enforcement Issues in a Risk-Informed Framework,” dated December 5, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003777558).
6. Locate the most recent escalated enforcement action for a power reactor on the Enforcement Web page of the NRC external Web site and review the transmittal letter and the attached notice of violation.
7. Review your region or office’s guidance on implementing the enforcement policy.
8. Go to TMS and complete the course on “Writing Violations.” Follow the guidance in the course to draft violations for the three sets of facts presented in the course.
9. Meet with the enforcement specialist in your region or office to review the draft violations you developed as part of the “Writing Violations” course and discuss the current enforcement guidance.
10. Meet with your immediate supervisor or the designated person and discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-6.

(ISA-7) Office of Investigations

PURPOSE:

The purpose of this activity is to familiarize you with the role of the Office of Investigations (OI). A qualified inspector may be assigned to work with OI by providing technical support. This ISA will help you to understand the role of OI, how it functions, and your responsibilities during an investigation.

COMPETENCY AREA: INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. MD 9.8, "Organization and Functions, Office of Investigations"
2. OI Web page on the NRC external Web site (<https://www.nrc.gov/about-nrc/organization/oifuncdesc.html#funcdesc>)
3. NRC OI on internal NRC 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 the staff's role in assisting OI, and why it is important to not discuss the facts/issues of the case to individuals that do not have "a need to know."
4. Describe the authorities of an OI investigator.

TASKS:

1. Review MD 9.8.
2. Review the OI Web page and associated organizational charts.
3. Meet with an experienced OI criminal investigator and discuss two materials/reactors cases investigated by OI, one substantiated and one not substantiated.
4. Meet with your immediate supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-7.

(ISA-8) Understanding How the Commission Operates

PURPOSE:

The NRC Commissioners establish the approach that the NRC staff will use to address a particular need of agency importance. Examples include the Commission policy statement regarding NRC staff use of probabilistic risk analysis in the decision-making process and resident inspector staffing requirements at power reactor facilities. Commission decisions can have a significant impact on the conduct of inspection activities, and inspectors should be familiar with the direction-setting and policymaking activities of the Commission.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC external Web sites

EVALUATION CRITERIA:

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

1. Locate Commission-related documents on the internal and external agency Web sites.
2. Discuss how the Commission uses staff requirements memoranda to direct the staff.

TASKS:

1. Read about the Commission's direction-setting and policymaking activities under "Policymaking".
2. Read about the different kinds of decision documents issued by the Commission.
3. Meet with your immediate supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-8.

(ISA-9) Organization and Content of the NRC Inspection Manual

PURPOSE:

The purpose of this activity is to introduce you to the content and organization of the NRC Inspection Manual and how it relates to inspection programs, particularly the Independent Spent Fuel Storage Installation (ISFSI) Inspection Program. As an inspector, you will be following an inspection program that is defined by a chapter of the manual and implemented by its associated IPs. This study activity will help you to identify and locate IPs that are used in the operating inspection program and to recognize the limitations associated with applying the guidance in the procedures. This activity will also introduce you to inspection manual chapters establishing policy that will govern some of your actions in implementing the inspection program.

COMPETENCY AREA: REGULATORY FRAMEWORK
INSPECTION

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC internal home page (Program Office—NMSS)
2. IMC 0040, "Preparation, Revision, Issuance, and Ongoing Oversight of NRC Inspection Manual Documents"

EVALUATION CRITERIA:

After completing this activity, you will demonstrate your understanding of the content and organization of the NRC Inspection Manual, as well as the limitations associated with applying the guidance in the manual, by successfully doing the following:

1. Identify the major parts of the NRC Inspection Manual.
2. State the purpose of each of the following types of documents located in the NRC Inspection Manual:
 - a. inspection manual chapters (IMCs)
 - b. inspection procedures (IPs)
 - c. temporary instructions (TIs)
 - d. change notices (CNs)
3. Describe the numbering/identification process used for the items in Criterion 2 above.
4. Demonstrate the ability to locate copies of inspection documents contained in the NRC Inspection Manual on the NRC Web site.

TASKS:

1. Read in detail the section of IMC 0040 titled "Responsibilities and Authorities" and become familiar with the remainder of the document.
2. Become familiar with the table of contents for the "NRC Inspection Manual," noticing the following:
 - a. The date of issuance and latest change notice entered in the table of contents.
 - b. The titles associated with CFR Part numbers.
 - c. The number associated with each document.
 - d. The issue date and change notice number associated with each document.
3. Locate the section of the NRC Inspection Manual titled "Technical Guidance."
4. Scan the titles of the individual guidance documents.
5. Meet with your immediate supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-9

(ISA-10) Federal, Tribal, and State Government Relations

PURPOSE:

Throughout an inspector's career, there may be several instances where interaction with a Tribal Nation may occur. In addition, while conducting inspection activities, inspectors 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 items, such as loose asbestos insulation, and other issues, such as radioactive waste shipping trailer concerns. To ensure that these items are addressed by the proper regulatory authority, the NRC has established agreements, called memoranda of understanding (MOU), with other Federal and State agencies which outline how these issues should be addressed.

This activity will introduce you to the NRC's liaison role and major interagency agreements that the NRC has entered into.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. IMC 1007, "Interfacing Activities between Regional Offices of NRC and OSHA"
2. "U.S. DOT/NRC Memorandum of Understanding," dated July 2, 1979 (*Federal Register* Notice 44 FR 8690)
3. Federal Emergency Management Agency (FEMA) and NRC MOU (ML051680117)
4. Additional Federal or State Agencies/NRC MOUs.
5. Tribal Policy Statement
6. MD 5.2, "Cooperation with States at Commercial Nuclear Power Plants and Other Nuclear Production or Utilization Facilities," Appendix A
7. TMS Training: Cultural Sensitivity Training: Engaging Native Americans in the NRC's Mission
8. Regional, division, or office guidance (if applicable)

EVALUATION CRITERIA:

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

1. Be able to discuss the NRC's commitment to communicate with Tribal Nations and how it relates to an inspector.

2. Be familiar with the appropriate protocol and how to display cultural sensitivity when interacting with Native American tribes.
3. Be familiar with active MOUs used to coordinate between the NRC and other Federal or State agencies.
4. Explain, in general terms, how the NRC coordinates with State and other Federal agencies on matters that are not under the regulatory authority of the NRC.
5. Explain the actions required by an NRC inspector when they identify an occupational health and safety issue at a facility. Be able to state where the guidance for these actions is provided.
6. Explain how other Federal, Tribal, and State Governments may identify issues of concern to the NRC.
7. Explain how an inspector interacts with State and Federal Agencies, and Tribal Governmental Representatives who request to observe in an NRC inspection.
8. Identify the regional or office point of contact for coordinating NRC activities with Tribal Governments as well as State and Federal agencies.

TASKS:

1. Identify where the current NRC MOU are available.”
2. Review the MOU to develop a general understanding of the agreements between the NRC and OSHA, DOT, FEMA, and DOE. For regional inspectors, review any MOU between the NRC and the States in your region.
3. Read the NRC’s Tribal Policy Statement.
4. Review MD 5.2, Appendix A.
5. Take the TMS Training listed in the reference section of this ISA.
6. Identify the government liaison for Tribal Nations and Federal/State agencies in your region or office.
7. Discuss with your regional or office government liaison about your role in interacting with Tribal Nations. Also discuss the current status of engagement with Tribes in the region.
8. Meet with your supervisor, an experienced inspector, or the above government liaison representative to discuss two issues that involved interface with other Federal or State agencies. Discuss how the agency addressed the issues in the context of the applicable NRC MOU and office guidance.
9. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-10.

(ISA-11) Interaction with the Public

PURPOSE:

The purpose of this activity is to acquaint you with the expectations for NRC inspectors when dealing with members of the public. Responsiveness and openness are essential to the agency's ability to fulfill its goal of enhancing openness. A qualified inspector will have many opportunities to interact with the public. This ISA will help you to understand NRC procedures, policies, and available resources related to interaction with the public.

COMPETENCY AREA: COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. NUREG/BR-0215, "Public Involvement in the Nuclear Regulatory Process," Revision 2
2. NUREG/BR-0297, "NRC Public Meetings"
3. MD 3.4, "Release of Information to the Public"
4. MD 3.5, "Attendance at NRC Staff-Sponsored Meetings"
5. MD 8.11, "Review Process for 10 CFR 2.206 Petitions"
6. Regional or office guidance related to interaction with the public (e.g., conduct of public meetings, response to inquiries from the public, release of information to the public)

EVALUATION CRITERIA:

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

1. Describe the expectations of NRC employees regarding answering telephone calls, e-mails or text messages that involve inquiries from a member of the public.
2. Name some resources available to assist you in responding to the following types of public inquiries:
 - a. general questions about NRC organization and functions
 - b. general questions about a technical topic such as radioactive particles
 - c. questions about a licensed facility's performance or an NRC inspection
 - d. questions on a specific technical issue of current interest

3. Describe what is meant by “plain language.” Identify where examples and guidance related to plain language can be found.
4. Explain what a “2.206 petition” is. Describe how the NRC handles it. Be aware of the NRC’s 2.206 Guidance.
5. Describe how other public inquiries, including “non-allegations,” are handled in your region or office.
6. Describe what an NRC employee should do if they are asked to speak (on an NRC-related topic) at a meeting, such as the Lions Club, the local chapter of the American Nuclear Society, or a school.
7. Identify the types of NRC meetings that are generally open to the public. List some that are not usually open to the public.
8. Describe how members of the public can find out about NRC public meetings. Discuss the expectations for timeliness of meeting notices and summaries.
9. Describe the restrictions regarding the release of information to the public, including specific types of information that are not to be released.

TASKS:

1. Review the information presented by the NRC Public Affairs Office on interactions with the public that can be found on the NRC internal and external Web sites. Review the information available on the external NRC Web site related to general topics of interest to the public, such as public involvement, school programs, and technical information papers.
2. Visit and explore the “PUBLIC MEETINGS & INVOLVEMENT” page on the NRC EXTERNAL Web site.
3. Locate and review the material specifically listed in the reference section of this activity.
4. Review the steps in the rulemaking process on the NRC external Web site under “How We Regulate.” <https://www.nrc.gov/about-nrc/regulatory.html>
5. Identify, locate, and review the region’s or office’s policy guidance on the staff’s receipt and processing of inquiries from the general public. Meet with your Public Affairs Officer (PAO) and discuss what is expected of an inspector who receives an inquiry. *Note: This ISA overlaps with ISA-12 Contacts with the Media, which also requires a meeting with your PAO. Please also review ISA-12 before meeting with the PAO.
6. Meet with your immediate supervisor or designee and discuss the types of public interactions that inspectors are likely to encounter and ensure that you understand the inspector’s role. Discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor’s or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-11.

(ISA-12) Contacts with the Media

PURPOSE:

The purpose of this activity is to provide an understanding of the importance of communicating with the public and 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 increasing openness. This study activity will provide you with information on the implementation of the guidance on contacts with the public and media.

COMPETENCY AREA: COMMUNICATION
SELF-MANAGEMENT

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. MD 3.4, "Release of Information to the Public"
2. NUREG/BR-0224, "Guidelines for Conducting Public Meetings"
3. NUREG-1614, "Strategic Plan"
4. NUREG/BR-0308, "Effective Risk Communication"
5. January 5, 2011, Yellow Announcement Regarding the Use of Social Media (ML11251A090)
6. Regional or office instructions establishing the policy and process for receipt of inquiries from the public or media

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the guidance on contacts with the media by successfully addressing the following:

1. Discuss the NRC goal of improving public confidence and how good communication with the media contributes to achievement of this goal.
2. Identify the importance of communicating with the media in a manner that builds trust.
3. Discuss the importance of agency goals, onsite inspection staff, the agency's safety focus, risk-informed policies, trustworthiness, and limitations on particular subject knowledge with regard to communicating with the media.
4. Discuss the importance of planning ahead and preparing well for communicating with the media.

5. Discuss the importance of controlling your speech, including what words not to use, not speculating, not guessing, not answering the “what if” questions, not giving your opinion or repeating any other person’s opinion, and not talking off the record.
6. Describe the policy and process for communicating to management any inquiries from, or unplanned interactions with, the news media and other members of the public.

TASKS:

1. Meet with the regional PAO or someone from the Office of Public Affairs at Headquarters to discuss the guidelines for interviews with the news media. *Note: This ISA overlaps with ISA-11 Interaction with the Public, which also requires a meeting with your PAO. Please also review ISA-11 before meeting with the PAO.
2. Explore all aspects of the importance of appropriate, accurate, and clear communications with the public as these aspects appear on the NRC Web site.
3. Review the agency guidance on how to communicate with the public and media, and NRC expectations/requirements regarding the use of social media when conducting NRC activities and issues that could occur regarding the sharing of information on social media.
4. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor’s or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-12.

(ISA-13) 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 communication with the public is very important, it 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—increasing openness. This study activity will provide you with information on the implementation of the guidance on responding to FOIA requests from the public.

COMPETENCY AREA: COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. 10 CFR Part 9, "Public Records"
2. TMS Training: "FOIA Training for Federal Employees"
3. MD 3.1, "Freedom of Information Act"
4. MD 3.2, "Privacy Act"
5. MD 3.4, "Release of Information to the Public"
6. Regional or office 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:

1. Discuss the NRC's goal of improving public confidence and how implementing the provisions of FOIA and the Privacy Act will contribute to achieving that goal.
2. Identify the completeness and timeliness requirements for responding to an FOIA request and discuss how important this responsiveness is in building public trust.
3. Discuss the following responsibilities when responding to an 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 information which should be withheld 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.
 7. Discuss the possible consequences associated with maintaining unnecessary electronic or paper copies of licensee documents following completion of an inspection activity.

TASKS:

1. Complete the course: “FOIA Training for Federal Employees,” within TMS.
2. Explore the information made available to the public on the NRC Web site and within ADAMS.
3. Review the agency guidance on how to implement FOIA without releasing predecisional information and other information covered under the Privacy Act.
4. Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.
5. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor’s or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-13.

(ISA-14) Entrance and Exit Meetings

PURPOSE:

Effective communication is critical for overall agency success. For NRC inspectors, the inspection entrance and exit meetings are the primary opportunities to communicate issues to the licensees. Besides communicating effectively, inspectors, as Government officials, have additional requirements to follow during entrance and exit meetings to ensure that proprietary data and safeguarded information are not disclosed, and that information is shared with the public when appropriate. To ensure that issues are discussed in accordance with NRC requirements, the agency has established communication standards that outline how entrance and exit meetings are to be conducted. The purpose of this activity is to introduce the standards for conducting NRC entrance and exit meetings and to allow you to demonstrate an ability to conduct an entrance and exit meeting.

COMPETENCY AREA: COMMUNICATION
TEAMWORK
INSPECTION

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. IMC 2515, "Light-Water Reactor Inspection Program-Operations Phase"
2. IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"
3. IMC 0620, "Inspection Documents and Records"
4. Regional or office guidance (if applicable)

EVALUATION CRITERIA:

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

1. Locate various guidance documents for conducting NRC entrance and exit meetings.
2. Successfully conduct an entrance and exit meeting in accordance with NRC guidance. A mock meeting may be conducted if an actual entrance and exit meeting does not fit the Inspector's Basic Qualification timeline.

TASKS:

1. Locate and read the guidance for conducting NRC entrance and exit meetings contained in IMC 2515 and regional or office instructions.

2. Observe at least one entrance and exit meeting. If possible, observe meetings that have been conducted for a wide range of inspection activities in a variety of locations, such as a public exit meeting.
3. Meet with a qualified inspector to have a discussion on expectations for Entrance and Exit Meetings.
4. While on inspection, conduct a real entrance and exit meeting with the aid of the lead inspector. If there is not an inspection within the timeline of completing Basic Qualifications, you may alternatively review an inspection report that was recently completed and conduct a “mock” entrance and exit meeting. Discuss the inspection report findings in the presence of your supervisor or a fully qualified inspector designated by your supervisor.
5. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor’s or designee’s signature in the line item for Basic-Level Certification Signature Card Item ISA-14.

(ISA-15) Documenting Inspection Findings

PURPOSE:

NRC inspection reports serve many important functions. In addition to serving as a vehicle to communicate inspection findings to a licensee, inspection reports form part of the historical record of NRC activities at a licensed site. To that end, it is vital for inspection reports to clearly document the results of inspection activities conducted. To assist inspectors in the preparation of inspection reports, the NRC has developed several guidance documents that outline what information should be documented in an inspection report and how that information should be presented. The purpose of this activity is to introduce the standards for preparing NRC inspection reports and to allow you to demonstrate an understanding of the applicable inspection report documentation requirements.

COMPETENCY AREA: INSPECTION
SELF-MANAGEMENT
COMMUNICATION
TEAMWORK
ASSESSMENT AND ENFORCEMENT

LEVEL OF EFFORT: 20 hours

REFERENCES:

1. IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports"
2. IMC 0611, "Power Reactor Inspection Reports"
3. "Plain Language Action Plan" Web site, which references NUREG-1379, "NRC Editorial Style Guide," the directives from the President of the United States, and other related documents: <http://www.internal.nrc.gov/NRC/PLAIN/index.html>
4. IMC 0620, "Inspection Documents and Records"
5. IMC 0612, "Issue Screening"
6. IMC 0612, "Appendix B, Issue Screening Directions"
7. Regional or office guidance (as applicable)

EVALUATION CRITERIA:

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

1. Locate guidance documents for preparing NRC inspection reports.
2. Verify that an inspection report was written in accordance with the applicable NRC guidance.

3. Explain the threshold for documenting licensee- and NRC-identified issues in NRC inspection reports.
4. Define inspection working files and indicate what should be captured in ADAMS, ultimately destroyed, or referenced in the inspection report.

TASKS:

1. Locate and read the guidance for documenting inspection findings. NRC IMCs and regional or office instructions will contain the necessary information.
2. Locate and read the guidance for documenting violations. NRC IMCs and regional or office instructions will contain the necessary information.
3. Review flow charts in Figure 1 and 2 of IMC 0612, Appendix B and understand when an issue is documented in the following categories: an unresolved item, a violation for which enforcement discretion is exercised, a traditional enforcement violation, a finding with a cross-cutting aspect, and as a licensee-identified non-cited violation in the Inspection Results of a power reactor inspection report.
4. Select recently completed inspection reports prepared in your region or office that contain (1) an NRC-identified finding, (2) a licensee-identified finding, (3) an NRC-identified violation, and (4) a licensee-identified violation. Compare the inspection report format and content to the report preparation guidance contained in either NRC IMC 0610 or IMC 0611/IMC 0612 and to any applicable regional or office guidance. Through review of the guidance, as well as conversations with the report author, verify that the report was prepared in accordance with the requisite report preparation guidance.
5. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-15.

(ISA-16) Environment for Raising Concerns & Ways to Raise Differing Views

PURPOSE:

The purpose of this activity is to communicate the agency's policy on establishing and maintaining an environment that supports raising concerns and differing views and to provide guidance on the informal and formal processes for pursuing resolution of differing views that are directly related to the NRC's mission. The NRC strives to establish and maintain an environment that encourages all NRC employees and contractors to raise concerns and differing views promptly, without fear of reprisal, through various mechanisms. The free and open exchange of views or ideas conducted in a non-threatening environment provides the ideal forum where concerns and alternative views can be considered and addressed in an efficient and timely manner that improves decision-making and supports the agency's safety and security mission. All NRC employees and contractors are expected to discuss their views and concerns with their immediate supervisors on a regular, ongoing basis. These informal discussions should be enough to resolve most issues. However, if informal discussions do not resolve concerns, employees have various mechanisms for expressing and having their concerns and differing views heard and considered by management, including the Open Door Policy, the Non-Concurrence Process (NCP), and the Differing Professional Opinion (DPO) Program. This activity will provide you with an understanding of these processes.

COMPETENCY AREA: INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 2 hours

REFERENCES:

1. NCP Web site: <https://usnrc.sharepoint.com/teams/NRC-Non-Concurrence-Process>
2. DPO Program Web site: <https://usnrc.sharepoint.com/teams/NRC-Differing-Professional-Opinions>
3. MD 10.160, "Open Door Policy"
4. MD 10.158, "NRC Non-Concurrence Process"
5. MD 10.159, "The NRC Differing Professional Opinions Program"
6. TMS Training: The Non-Concurrence Process (NCP)
7. TMS Training: Differing Professional Opinion (DPO) Program
8. Regional or office instructions establishing additional implementing guidance for raising differing views (if applicable)

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC processes for raising concerns and differing views by successfully addressing the following:

1. Discuss under what circumstances the various methods available for expressing differing views would be used.
2. Describe the Open Door Policy.
3. Describe the key features of the NCP.
4. Describe the key features of the DPO Program.
5. Describe the type of information available on the NCP and DPO Program Web Site on the NRC internal page under Office of Enforcement. (<https://intranet.nrc.gov/oe>)

TASKS:

1. Explore information and guidance for Open Door Policy, NCP, and DPO Program on identified Web Sites.
2. Complete NCP training in TMS
3. Complete DPO Training in TMS
4. Review MD 10.160, MD 10.158, and MD 10.159.
5. Meet with your immediate supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-16.

(ISA-17) Overview of 10 CFR Part 71 and 72

PURPOSE:

The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the fabrication of a dry storage system (DSS), and construction and operation of an ISFSI. This ISA will help you to understand the content of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," and 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste," and how to locate the specific requirements related to these regulations.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. NRC internal home page
2. 10 CFR Part 71 and 72

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 Part 71 and 72 by successfully discussing the following:

1. State the purpose of 10 CFR Part 71 and 72.
2. Given a specific subject, identify which section in 10 CFR Part 71 and 72 discusses the requirements for that subject by using the search feature on the NRC "Regulations" and "Nuclear Regulatory Legislation" Web pages.

TASKS:

1. Become familiar with, and be able to use, the search feature to locate the information available in NRC "Regulations" and "Nuclear Regulatory Legislation" Web pages found on the NRC internal Web site.
2. Read and be familiar with 10 CFR Part 71 and 72.
3. Discuss the differences between the requirements in 10 CFR Part 71 and Part 72
4. Discuss the differences between a general license and specific license under 10 CFR Part 72.

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: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-17.

(ISA-18) Overview of 10 CFR Part 19 and 10 CFR Part 20

PURPOSE:

The purpose of this activity is to familiarize you with 10 CFR Part 19, "Notices, Instructions and Reports to Workers: Inspection and Investigations," and 10 CFR Part 20, "Standards for Protection against Radiation." These regulations will provide a perspective on conducting inspections in the working environment of a nuclear reactor. This ISA will help you to understand the purpose of 10 CFR Part 19 and 10 CFR Part 20 and provide you with some basic knowledge that all NRC inspectors will use when conducting inspections in controlled areas containing radioactive material.

COMPETENCY: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC internal Web page "Information Resources-Regs (10 CFR) NRC Maintained Parts 19 and 20

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your general understanding of 10 CFR Part 19 and 10 CFR Part 20 and why these regulations are important for all inspectors by successfully addressing the following:

1. Describe the purpose of 10 CFR Part 19.
2. Identify the section of 10 CFR Part 19 that describes the rights of radiation workers if they believe a violation of radiological working condition requirements has occurred.
3. Identify the section of 10 CFR Part 19 that requires a licensee to report doses to workers.
4. Describe the purpose of 10 CFR Part 20.
5. Identify the relevant section of 10 CFR Part 20 and discuss the various radiological circumstances that would require a licensee to notify the NRC.
6. Discuss why it is important for every NRC inspector to have a general understanding of 10 CFR Part 19 and 10 CFR Part 20.
7. Discuss the posting requirements for areas containing radioactive materials.

TASKS:

1. Review 10 CFR Part 19 for a general understanding of the following:

- a. the purpose of 10 CFR Part 19 (19.1)
 - b. requirements for document postings (19.11(d) and (e))
 - c. requirements for promptly identifying any condition that may cause unnecessary exposure (19.12(a)(4))
 - d. instructions for individuals in a restricted area that may experience unnecessary exposure to radiation and/or radioactive materials (19.12(a)(5))
 - e. the times the NRC is allowed to inspect a facility (19.14(a))
 - f. requests by workers for an NRC inspection (19.16(a))
2. Review 10 CFR Part 20 for a general understanding of the following:
 - a. the purpose of 10 CFR Part 20 (20.1001)
 - b. occupational dose limits for adults (20.1201)
 - c. occupational dose limits for members of the public (20.1301)
 - d. concepts of as low as is reasonably achievable (ALARA) (20.1101)
 - e. conditions requiring individual monitoring of external and internal occupational dose (20.1502)
 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: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-18.

(ISA-19) NRC Safety Culture Program

PURPOSE:

The purpose of this study activity is for you to obtain general knowledge of the NRC's Safety Culture Program. Upon completion of this study activity, you will have the necessary background to apply the Safety Culture Program to the inspection process.

COMPETENCY AREA: ASSESSMENT REGULATORY FRAMEWORK

LEVEL OF EFFORT: 16 hours

REFERENCES:

1. IMC 0305, "Operating Reactor Assessment Program" (focus on cross-cutting issues topics)
2. NRC's external Web site: <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>
3. Safety Culture ROP Training: <http://papaya.nrc.gov/safetyculture/index.html>
4. TMS Training: "Review of the Columbia Space Shuttle Accident"
5. IMC 0310, "Aspects Within the Cross-Cutting Areas"
6. IMC 0611, "Power Reactor Inspection Reports"
7. SECY-06-122, "Safety Culture Initiative Activities to Enhance the Reactor Oversight Process and Outcomes of the Initiatives"
8. IPs 40100, "Independent Safety Culture Assessment Follow-up"; 71152, "Problem Identification and Resolution (PI&R)"; 95001, "Supplemental Inspection Response to Action Matrix Column 2 (Regulatory Response) Inputs"; 95002, "Supplemental Inspection Response to Action Matrix Column 3 (Degraded Performance) Inputs"; 95003, "Supplemental Inspection Response to Action Matrix Column 4 (Multiple/Repetitive Degraded Cornerstone) Inputs"; 71153, "Follow up of Events and Notices of Enforcement Discretion"; 93800, "Augmented Inspection Team"; and 93812, "Special Inspection"
9. Safety Culture Policy Statement and *Federal Register* Notice (ML11146A047) (<https://www.nrc.gov/about-nrc/safety-culture/sc-outreach-edu-materials.html>)
10. IP 93100; "Safety-Conscious Work Environment Issue of Concern Follow-up"
11. Safety Culture Case Study User Guide (ML15196A440) and Educational Material (<https://www.nrc.gov/about-nrc/safety-culture/sc-outreach-edu-materials.html>)
12. NUREG 2165, "Safety Culture Common Language"

EVALUATION CRITERIA:

After completing this study activity, you should demonstrate a general understanding of the Safety Culture Program by successfully doing the following:

1. State the purpose of the NRC's Safety Culture Program.
2. Define "cross-cutting issue."
3. Describe a safety-conscious work environment.
4. Explain the role of the inspector in the NRC Safety Culture Program.
5. Explain how to document a safety-significant finding considering the expectations of the NRC's Safety Culture Program. (See the NRR Case Studies listed in the reference section.)
6. Discuss general safety culture aspects and the graded ROP approach to recognizing potential weaknesses in licensee safety culture and taking appropriate agency actions.

TASKS:

1. Review referenced Safety Culture Training and inspection procedures.
2. Define safety culture and safety conscious work environment (SCWE) and discuss why they are important, how they are different, and how they support each other.
3. Explain the relationship of the cross-cutting areas with the safety culture aspects.
4. Discuss how the causes and cross-cutting aspects would be identified and documented for several current or hypothetical inspection findings.
5. Review the Safety Culture Policy Statement. Discuss the nine traits listed in that policy along with the cross-cutting aspects listed in IMC 0310, and the corresponding examples found in NUREG-2165.
6. Discuss the agency's graded approach to dealing with potential safety culture issues as licensee performance declines.
7. Meet with you supervisor, a qualified operations resident inspector, or a qualified Safety Culture Assessor to discuss any questions that you may have as a result of this activity and demonstrate that you can meet the evaluation criteria above.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-19.

PART II. BASIC-LEVEL ON-THE-JOB ACTIVITIES

The on-the-job training (OJT) activities require you to conduct inspection-related work, under supervision, at an ISFSI. These activities are designed to allow you to observe and perform key inspector tasks under controlled circumstances. Like the ISAs, each of the OJT activities informs you about the following:

- Why the activity is important
- How much time may be needed to complete the assignment
- What you are expected to complete successfully during the activity

Before beginning the activities in this section, you must successfully complete the course work for site access. You can do this in one of two ways: by completing the NRC site access course and the site-specific requirements for access, or by completing the site access requirements at a site. Your immediate supervisor will discuss with you the best way to meet the site access requirements.

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

- You should complete the activities in this section in the order in which they are presented.
- You should complete all parts of each activity.
- Your supervisor 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 supervisor may also designate other fully qualified inspectors to work with you as you complete the various activities and to sign off the material or training courses you have completed.
- You are responsible for keeping track of the tasks you have completed. Be sure to complete all aspects of an OJT activity before meeting with your supervisor for evaluation.

(OJT-1) Familiarization Tour of Fabrication Shop with a Qualified Inspector

PURPOSE:

The purpose of this activity is to familiarize you with (1) the general layout of a fabrication facility and identity of various major equipment used for fabrication and testing, and (2) the types of industrial and radiological (as applicable) personal protection requirements and the proper method of complying with these requirements. Specific attention should be devoted to the welding and testing areas.

COMPETENCY AREA: INSPECTION
COMMUNICATION
FUNDAMENTAL FACILITY DESIGN AND OPERATION

NOTE: Complete at least two facility tours.

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. Certificates of Compliance of the DSS or transportation packaging being fabricated at the facility.
2. Transportation packaging or DSS drawings of the components being fabricated at the facility.
3. Fabrication facility traveler(s) for components being fabricated or tested.

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the general fabrication process and major equipment used in each fabrication area and inspector behavior in the fabrication facility by successfully addressing the following:

1. Given a fabrication facility traveler, be able to identify the major equipment and areas applicable to the fabrication process.
2. Identify the types of industrial personnel safety equipment that are available and the circumstances under which each piece of equipment should be used.
3. Given specific scenarios related to industrial hazards, describe the actions the staff should take.

TASKS:

1. Review a traveler and associated drawing(s) of the components being fabricated and plan a route for a tour that will include the major areas of fabrication, such as the following:
 - a. Component cutting and machining;
 - b. welding;
 - c. inspection and testing such as dye penetrant testing and radiographic testing;
 - d. quality material storage;
 - e. receipt inspection;
 - f. measuring and test equipment storage/issuance;
 - g. quality record storage; and
 - h. other areas deemed appropriate by a qualified inspector.
2. Before the tour, discuss the requirements for personal industrial safety equipment with a qualified inspector, including but not limited to, welding and hot work.
3. Tour the facility with a qualified inspector and locate the major areas of fabrication, including, but not limited to, those items described above.
4. If applicable to the fabrication facility, tour the radiographic testing area with a qualified inspector and observe and/or discuss items such as radiological controls and postings.
5. During the tour, discuss the proper procedures for entering the areas discussed above (as applicable), including the actions to take if a procedural error is committed or observed.
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: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item OJT-1.

(OJT-2) Documenting Inspection Findings

PURPOSE:

The purpose of this activity is to give guidance on content, format, and style for inspection reports. The objectives of this activity are to ensure that inspection reports (1) clearly communicate significant inspection results to CoC holders, NRC staff, and the public, (2) provide a basis for significance determination and enforcement action, and (3) present information associated with significant inspection findings in a manner that will be useful to NRC management in developing long-term, broad assessments of CoC holder performance.

COMPETENCY AREA: FUNDAMENTAL FACILITY DESIGN AND OPERATION
INSPECTION
COMMUNICATION
TEAMWORK
ASSESSMENT AND ENFORCEMENT

LEVEL OF EFFORT: 45 hours

REFERENCES:

1. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
2. IMC 0610, "Nuclear Material Safety and Safeguards Inspection Reports," or IMC 0611, "Power Reactor Inspection Reports"
3. IMC 0612, Appendix B, "Issue Screening"
4. IMC 0612, Appendix E, "Examples of Minor Issues"
5. IMC 0617, Appendix E, "Minor Examples of Vendor and QA Implementation Findings"
6. IMC 0620, "Inspection Documents and Records"
7. Enforcement Policy

EVALUATION CRITERIA:

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

1. Discuss the thresholds for determining which findings should be documented in an inspection report.
2. Describe how traditional enforcement (TE) violations are processed.
3. Discuss how to write input to an inspection report.

4. Discuss how to write a violation. Contrast the differences in documenting a non-cited violation, cited violation, and an apparent violation.
5. Compare the documentation for an inspector-identified violation to that required for a licensee-identified violation (in terms of format, threshold, tracking, etc.).

TASKS:

1. Use IMC 0610 and IMC 0617 to determine whether an identified issue is above the threshold for documentation. Be familiar with the guidance in IMC 0611 and IMC 0612.
2. Use IMC 0610, to process a finding. Be familiar with the process described in IMC 0611 and IMC 0612.
3. Use IMC 0610 and other available guidance to draft an inspection report input.
4. Given a violation of regulatory requirements and the enforcement policy and guidance, write a non-cited violation and cited violation
5. Use IMC 0330 and IMC 0620 to describe how to determine the documents that must be included as attachments to an inspection report for the agency record.
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: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item OJT-2.

Form A-1: Inspector Basic-Level Signature Card and Certification

Inspector's Name:	Employee Initials Date	Supervisor's Signature/Date
<u>Part A: Training Courses</u>		
NRC: An Agency Overview		
Gathering Information for Inspectors through Interviews		
Effective Communications for NRC Inspectors		
G-105, Conducting Reactor Inspections or G-103, Field Techniques		
Industrial Safety/OSHA		
Media Training Workshop		
G-205, Root Cause/Incident Investigation Workshop		
H-100S, Site Access Training Self-Study Course (or licensee site access)		
<u>Part I. Individual Study Activities</u>		
(ISA-1) History and Organization of the U.S. Nuclear Regulatory Commission		
(ISA-2) Inspector Objectivity, Protocol, and Professional Conduct		
(ISA-3) Fitness-for-Duty Rule		
(ISA-4) Allegations		
(ISA-5) NRC's Response to an Incident at a Nuclear Facility		
(ISA-6) Enforcement Program		
(ISA-7) Office of Investigations		
(ISA-8) Understanding How the Commission Operates		
(ISA-9) Organization and Content of the NRC Inspection Manual		
(ISA-10) Federal, Tribal, and State Government Relations		
(ISA-11) Interaction with the Public		
(ISA-12) Contacts with the Media		
(ISA-13) The Freedom of Information Act and the Privacy Act		
(ISA-14) Entrance and Exit Meetings		

(ISA-15) Documenting Inspection Findings		
(ISA-16) Environment for Raising Concerns & Ways to Raise Differing Views		
ISA-17 Overview of 10 CFR Part 71 and 72		
(ISA-18) Overview of 10 CFR Part 19 and 10 CFR Part 20		
(ISA-19) NRC Safety Culture Program		
<u>Part II. On-the-Job Training Activities</u>		
(OJT-1) Facility Familiarization Tour with a Qualified Inspector		
(OJT-2) Documenting Inspection Findings		

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

Supervisor's Signature: _____ Date: _____

Form A-2: Basic-Level Equivalency Justification

Description of Qualification Requirement	Identify equivalent training and experience for which the inspector is to be given credit.
<u>Part A: Training Courses</u>	
NRC: An Agency Overview	
Gathering Information for Inspectors through Interviews	
Effective Communications for NRC Inspectors	
G-105, Conducting Reactor Inspections	
Industrial Safety/OSHA – “Name Subject to Change”	
Media Training Workshop	
G-205, Root Cause/Incident Investigation Workshop	
H-100S, Site Access Training Self-Study Course	
<u>Part A-2. Individual Study Activities</u>	
ISA-1 History and Organization of the U.S. Nuclear Regulatory Commission	
ISA-2 Inspector Objectivity, Protocol, and Professional Conduct	
ISA-3 Fitness-for-Duty Rule	
ISA-4 Allegations	
ISA-5 NRC’s Response to an Incident at a Nuclear Facility	
ISA-6 Enforcement Program	
ISA-7 Office of Investigations	
ISA-8 Understanding How the Commission Operates	
ISA-9 Organization and Content of the NRC Inspection Manual	
ISA-10 Federal, Tribal, and State Government Relations	
ISA-11 Interaction with the Public	
ISA-12 Contacts with the Media	

Description of Qualification Requirement	Identify equivalent training and experience for which the inspector is to be given credit.
ISA-13 The Freedom of Information Act and the Privacy Act	
ISA-14 Entrance and Exit Meetings	
ISA-15 Documenting Inspection Findings	
ISA-16 Environment for Raising Concerns & Ways to Raise Differing Views	
ISA-17 Overview of 10 CFR Part 71 and 72	
ISA-18 Overview of 10 CFR Part 19 and 10 CFR Part 20	
ISA-19 NRC Safety Culture Program	
<u>Part A-3. On-the-Job Training Activities</u>	
OJT-1 Facility Familiarization Tour with a Qualified Inspector	
OJT-2 Documenting Inspection Findings	

Supervisor's Signature: _____ Date: _____



Certificate of Completion

This is to certify that



Has successfully completed all of the requirements
for the

Basic Qualification for a Storage and Transportation Inspector

Date

Immediate Supervisor Name, Chief
Branch

Part B: Technical Proficiency Training

TECHNICAL PROFICIENCY TRAINING COURSES

This part of the Qualification Journal focuses on technical training needed to understand the operations, regulatory requirements, and inspection process of an SAT Inspector. You may complete the Basic-Level Proficiency requirements together with the Technical Proficiency requirements.

PART I. TECHNICAL PROFICIENCY INDIVIDUAL STUDY ACTIVITIES

The individual study activities (ISAs) are designed to direct and focus your efforts as you begin reviewing documents that will be important to the performance of your job. Each study activity begins with a purpose statement informing you of why the activity is important and how it relates to the job of an inspector. The level of effort has been noted so that you have an idea of how much effort should be expended in completing the activity. (These times are estimates. You may need a little more or a little less time.) You should review the evaluation criteria first to better understand what you should achieve as a result of completing the activity. The evaluation criteria should help you to focus on the relevant information. The tasks outline the items that you must complete to successfully address the evaluation criteria.

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

- You should complete all parts of each activity.
- Your immediate supervisor will act as a resource as you complete each activity. Your immediate supervisor may also designate other fully qualified individuals to work with you and sign off the qualification journal as you complete the material. You should discuss any questions with your supervisor or designated resource.
- You are responsible for keeping track of the tasks completed. You should complete all the tasks in each activity before meeting with your immediate supervisor or designee for evaluation.

(ISA-Technical-1) ISFSI and Transportation Packaging Inspection Procedures

PURPOSE:

The purpose of this activity is to introduce you to the content and organization of the U.S. Nuclear Regulatory Commission (NRC) Inspection Manual and how it relates to the SAT inspection program. As an inspector, you will be following an inspection program that is defined by an Inspection Manual chapter (IMC) and implemented by its associated inspection procedures (IPs). This study activity will help you identify and locate inspection procedures that are used in the SAT inspection program and to recognize the limitations associated with applying the guidance contained in the procedures. This activity will also introduce you to IMCs establishing policy that will govern some of your actions in implementing the inspection program.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. IP 60851, "Design Control of ISFSI Components"
2. IP 60852, "ISFSI Component Fabrication by Outside Fabricators"
3. IP 60853, "On-Site Fabrication of Components and Construction of an ISFSI"
4. IP 60854, "Preoperational Testing of an ISFSI"
5. IP 60855, "Operation of an ISFSI"
6. IP 60856, "Review of 10 CFR 72.212(b) Evaluations"
7. IP 60857, "Review of 10 CFR 72.48 Evaluations"
8. IP 60858, "Away-From-Reactor ISFSI Inspection Guidance"
9. IP 60859, "ISFSI License Renewal Inspection" – (IP Under Development at the time of issuance for this IMC.)
10. IP 86001, "Design, Fabrication, Testing, and Maintenance of Transportation Packagings"
11. IMC 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor-Related Greater-Than-Class C Waste at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings"
12. RG 7.7, "Administrative Guide for Verifying Compliance with Packaging Requirements for Shipping and Receiving of Radioactive Material"

EVALUATION CRITERIA:

After completing this activity, you should be able to successfully do the following:

1. Identify the NRC IMC that established the ISFSI and Transportation Packaging inspection programs.
2. State the purpose of each of the following types of documents located in the NRC IMC:
 - a. IMCs
 - b. IPs
3. Identify when each IP should be used and the purpose of IPs.
4. Discuss an IP used frequently in your office with your supervisor and demonstrate knowledge of the scope and activities required by this procedure.

TASKS:

1. Read in detail IMC 2690.
2. Read in detail the IPs used to perform ISFSI and Transportation Packaging inspections that are most commonly used in your office.
3. Review the contents of RG 7.7.
4. Meet with your supervisor or an experienced inspector to discuss the scope of an upcoming inspection and the inspection plan to carry out the requirements of the IP.
5. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-1.

(ISA-Technical-2) Quality Assurance Program

PURPOSE:

This activity will provide you with a working knowledge of the contents of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, "Packaging and Transportation of Radioactive material," Subpart H, "Quality Assurance," 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste," Subpart G, "Quality Assurance Program," industry standards, and the associated CoC holder or licensee programs and documents that collectively establish the basis for the CoC holder's licensee's quality assurance (QA) program.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. 10 CFR Part 72, Subpart G, "Quality Assurance"
2. 10 CFR Part 71 Subpart H, "Quality Assurance"
3. Regulatory Guide (RG) 1.28, "Quality Assurance Program Requirements (Design and Construction)," Current Revision
4. RG 1.33, "Quality Assurance Program Requirements (Operation)"
5. RG 7.10, "Establishing Quality Assurance Programs for Packing Used in the Transport of Radioactive Material"
6. American Society of Mechanical Engineers (ASME) Standard NQA-1 (Latest Endorsed Version), "Quality Assurance Program for Nuclear Facility Applications"
7. American National Standards Institute (ANSI)/American Nuclear Society (ANS) 3.2-2012, "Managerial, Administrative, and Quality Assurance Controls for Operational Phase of Nuclear Power Plants"
8. International Organization for Standardization (ISO) Q9001, "Quality management systems – Requirements" Current Version
9. NUREG-2215, "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities"
10. NUREG-2216, "Standard Review Plan for Transportation Packages for Spent Fuel and Radioactive Material"
11. NUREG/CR-6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety"
12. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"

13. Information Notice (IN) 2000-11, "Licensee Responsibility for Quality Assurance Oversight of Contractor Activities Regarding Fabrication and Use of Spent Fuel Storage Cask Systems"

14. IN 2002-35, "Changes to 10 CFR Parts 71 and 72 Quality Assurance Programs"

EVALUATION CRITERIA:

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

1. Discuss the general content of 10 CFR Part 72, Subpart G, 10 CFR 71, Subpart H, and the 18 criteria of a QA program.
2. Describe the relationship between the dry storage system (DSS) and transportation packaging Certificate of Compliance (CoC), the safety analysis report (SAR), the Part 72 CoC technical specifications, and 10 CFR Part 72, Subpart G/10 CFR Part 71, Subpart H, as applicable.
3. Outline the key elements of an effective QA program, and the licensee's implementation of those elements at a facility.

TASKS:

1. Review and discuss the 18 criteria of 10 CFR Part 72, Subpart G, as well as the criteria in 10 CFR Part 71 with your immediate supervisor or designee and communicate an understanding of their content and general application to field inspections.
2. Review the basic regulations that require a QA program. Review industry standards related to QA. Find the parts of the DSS and transportation packaging SAR, technical specifications (as applicable to Part 72), and CoC that address QA. Review a CoC holder's QA program and the implementing procedures.
3. Be familiar with the material listed in the reference section of this ISA.
4. Become familiar with the contents and organization of ASME NQA-1.
5. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-2.

(ISA-Technical-3) ISFSI & CoC Holder Licensing

PURPOSE:

The purpose of this activity is to familiarize you with some documents used for the licensing of ISFSIs, Dry Storage Systems (DSS), and Transportation Packaging and ways to access these documents during an onsite inspection. These documents describe how a CoC holder or licensee complies with NRC regulations and requirements. This activity will acquaint you with the most common types of licensing documents and show how individual facilities may implement NRC requirements differently, but still comply with the intent of the NRC's regulations.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 24 hours

REFERENCES:

1. NUREG-2215, "Standard Review Plan for Dry Storage Systems and Facilities"
2. NUREG-2216, "Standard Review Plan for Transportation Packages for Spent Fuel and Radioactive Material"
3. NUREG-1864, "A Pilot Probabilistic Risk Assessment of a Dry Cask Storage System at a Nuclear Power Plant"
4. NUREG/CR – 5502, "Engineering Drawings for 10 CFR Part 71 Package Approvals"
5. IAEA Safety Standards, No. SSR-6, "Regulations for the Safe Transport of Radioactive Material" (Latest Revision)
6. Sample Part 71/72 CoC
7. Sample technical specification for a CoC and specific ISFSI license
8. Sample Dry Storage System CoC safety evaluation report
9. Sample Transportation Package CoC safety evaluation report.
10. A sample of Part 71 and Part 72 SARs.
11. RG 7.9, "Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material"
12. IN 04-13, "Registration, Use, and Quality Assurance Requirements for NRC-Certified Transportation Packages"
13. IN 05-10, "Changes to 10 CFR Part 71 Packages"

EVALUATION CRITERIA:

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

1. Discuss the main areas of review during ISFSI and CoC Holder licensing activities.
2. Identify the regulatory enforcement hierarchy that exists between CFR requirements, a Part 71/72 CoC and ISFSI specific license, Part 72 CoC and specific ISFSI license technical specifications, Part 71/72 CoC and specific ISFSI license safety analysis reports and safety evaluation reports, and Part 71/72 CoC holder and ISFSI specific license implementing procedures.
3. Locate where the following can generally be found:
 - a. CoC design bounding limits
 - b. safety limits (ISFSI specific license)
 - c. design-basis accident analysis
 - d. limiting conditions for operation (Part 72 only)
 - e. bases for limiting conditions for operation (Part 72 only)
 - f. NRC criteria for accepting a safety analysis
 - g. CoC holder or licensee commitments to various standards
4. Demonstrate an understanding of risk-significant review topics and application of these risk insights to the inspection process.
5. Understand what a backfit is.
6. Be aware of the contents of RG 7.9
7. Be familiar with what information is inside IAEA Safety Standards No. SSR-6. Explain the purpose of the ISFSI Inspector Counterpart Meeting and the monthly phone call between the regions that implement the ISFSI inspection program and DFM representatives. Understand the inspector's and region's role at these meetings.

TASKS:

1. Locate all applicable reference documents.
2. Become familiar with the Standard Review Plans to understand aspects of ISFSIs, DSSs, and Transportation Packages subject to review by the Office of Nuclear Materials Safety and Safeguards.
3. Explain the enforceability of licensing documents.
4. Attend an ISFSI Inspector counterpart meeting.

5. Participate in a least two monthly phone calls between the regions responsible for implementation of the ISFSI inspection program and DFM representatives.
6. Become familiar with the location of DFM procedures.
7. Review RG 7.9.
8. Review the table of contents of IAEA Safety Standards No. SSR-6.
9. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-3

(ISA-Technical-4) Management Controls Part I (QA Policy & Document Control)

PURPOSE:

The purpose of this activity is to familiarize you with inspecting four individual elements of Management Controls: Quality Assurance Policy and Document Control. This activity will introduce you to the documents to view, and the interviews to conduct to ensure successful implementation of Management Controls by CoC holders or licensees. The two elements above consist of specific topics that relate to the quality assurance criteria in Part 71, Subpart H and Part 72, Subpart G. Quality Assurance Policy includes, but is not limited to, the QA Organization and the Quality Assurance Program, which consists of the graded approach to quality, QA indoctrination and training, and management reviews. Document Control includes, but is not limited to, Quality Records.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. NUREG/CR-6314, Quality Assurance Inspections for Shipping and Storage Containers
2. 10 CFR Part 71 Subpart H, "Quality Assurance"
3. 10 CFR Part 72 Subpart G, "Quality Assurance"
4. 10 CFR 21, "Reporting of Defects and Noncompliance"
5. Latest Revision of RG 1.28, "Quality Assurance Program Criteria (Design and Construction)"
6. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material"
7. ASME NQA-1 (Latest Endorsed Edition), "Quality Assurance Requirements for Nuclear Facility Applications"
8. NUREG/CR-6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety"
9. CoC Holder/Licensee QA program documentation

EVALUATION CRITERIA:

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

1. Be familiar with the regulatory requirements listed under the Management Controls section of NUREG/CR-6314.

2. Be familiar with the individual components of Management Control, and what needs to be inspected as well as who needs to be interviewed to ensure licensee compliance with the appropriate regulations.
3. Explain how what you learned in ISAT-2, Quality Assurance Program, is related to inspecting management controls.
4. Describe how Document Control play an important role in ensuring DSS and transportation packaging components are adequately fabricated.
5. Describe what it means for a QA organization to have sufficient freedom from cost and schedule influences.
6. Describe how a CoC holder or licensee would adequately store quality records to minimize the risk of loss or damage and provide for retrievability during the required retention period.
7. Explain what is typically included in a Part 71/72 quality assurance program that uses a graded approach to quality.

TASKS:

1. Review the applicable subsections of the Management Controls section of NUREG/CR-6314 and the associated regulations.
2. Relook at the evaluation criteria in ISAT-2 and verify you are able to complete each of the evaluation criteria.
3. Be familiar with the material listed in the reference section of this ISA. Read RG 1.28.
4. Read RG. 7.10. Pay particular attention to the guidance on a graded approach to quality.
5. Read, in detail, ASME NQA-1, Part I, Requirement 1, "Organization," Requirement 2, "Quality Assurance Program," Requirement 6, "Document Control," and Requirement 17, "Quality Assurance Records." Additionally, read in detail the associated subparts in Part III to these three requirements.
6. At a site, gain a general understanding of the CoC holder's QA organization, overall QA policy, and document control program through a combination of discussions with a qualified inspector and a review of the QA program and associated implementing procedures prepared by the CoC holder.
7. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criterion section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-4

(ISA-Technical-5) Management Controls Part II
(Corrective Action, Nonconformance Controls, and Audits)

PURPOSE:

The purpose of this activity is to familiarize you with inspecting the remaining three individual elements of Management Controls: Corrective Action, Nonconformance Controls, and Audits. This activity will introduce you to the documents to view, and the interviews to conduct to ensure successful implementation of Management Controls by CoC holders or licensees.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"
2. 10 CFR Part 71, Subpart H, "Quality Assurance"
3. 10 CFR Part 72, Subpart G, "Quality Assurance"
4. 10 CFR Part 21, "Reporting of Defects and Noncompliance"
5. Latest Revision of Regulatory Guide 1.28, "Quality Assurance Program Criteria (Design and Construction)"
6. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material"
7. ASME NQA-1 (Latest Endorsed Edition), "Quality Assurance Requirements for Nuclear Facility Applications"
8. IP 71152, "Problem Identification and Resolution (PI&R)"
9. Site Specific documents that describe the licensee's corrective action program (CAP)
10. Sample NRC Approved QAP for sections pertaining to Management Controls, and if possible, implementing procedures.
11. Nuclear Procurement Issues Corporation (NUPIC) Audit Checklist

EVALUATION CRITERIA:

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

1. Be familiar with the regulatory requirements listed under the Management Controls section of NUREG/CR-6314.

2. Discuss the principal steps in a site's CAP with respect to identification of a condition adverse to quality and significant condition adverse to quality through final resolution.
3. Demonstrate an understanding of the requirements for a CoC holder when a material, part, or component does not conform with requirements.
4. Discuss the principal steps in a CoC holder's nonconformance process with respect to identification and subsequent control or segregation through disposition and release. Be familiar with the different types of Audits, and the requirements for each.
5. State how the guidance in RG 7.10 ties back to Management Controls, and when they apply.

TASKS:

1. Review the applicable subsections of the Management Controls section of NUREG/CR-314 and the associated regulations.
2. Review RG. 1.28.
3. Review RG. 7.10.
4. Read, in detail, ASME NQA-1, Part I, Requirement 15, "Control of Nonconforming Items," Requirement 16, "Corrective Action," and Requirement 18, "Audits". Additionally, read in detail the associated subparts in Part III for these three requirements.
5. Understand 10 CFR 71.133 and 72.172, Corrective action.
6. At a CoC holder's facility, gain a general understanding of the CoC holder's nonconformance control program and CAP through a combination of discussions with a qualified inspector and interviews of personnel responsible for those programs. In addition, with a qualified inspector, tour the CoC holder facility to identify nonconforming components, discuss their status, and verify proper controls.
7. Using IP 71152 for guidance, review a sample of about six issues entered into the CoC holder's CAP within the past month, and compare the CoC holder's actions with regulatory requirements. Discuss the resolution of the issues with a qualified inspector.
8. At a CoC holder's facility, gain a general understanding of the CoC holder's audit program for both internal and external audits through a combination of discussions with a qualified inspector and interviews of CoC holder audit personnel. Review a sample of three internal and three external audit reports to become familiar with the scope of the audits performed and objective evidence used to determine the conclusions in the reports.
9. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criterion section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-5

(ISA-Technical-6) Design Controls

PURPOSE:

The purpose of this activity is to familiarize you with inspecting the two individual elements of Design Controls: Design Development and Modifications. This activity will familiarize you with the documents to view, and the interviews to conduct to ensure successful implementation of Design Controls by licensees.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"
2. 10 CFR Part 71, Subpart H, "Quality Assurance"
3. 10 CFR Part 72, Subpart G, "Quality Assurance"
4. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material"
5. ASME NQA-1 (Latest NRC Endorsed Version), "Quality Assurance Requirements for Nuclear Facilities"
6. RG 3.72, "Guidance for Implementation of 10 CFR 72.48, "Changes, Tests, and Experiments"
7. IMC 0335, "Changes Tests, and Experiments"
8. NEI 12-04, "Guidelines for 10 CFR 72.48 Implementations"
9. IN 97-039, "Inadequate 10 CFR 72.48 Safety Evaluation of Independent Spent Fuel Storage Installations"
10. Legacy SFST-ISG 21, "Use of Computational Modeling Software"
11. Licensee 10 CFR 72.48 procedure (if available)
12. RIS 12-05: "Clarifying the Relationship Between 10 CFR 72.212 and 10 CFR 72.48 Evaluations"
13. Sample NRC Approved QAP for sections pertaining to Design Controls, and if possible, implementing procedures.

EVALUATION CRITERIA:

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

1. Be familiar with the content under Design Controls within NUREG/CR-6314
2. Be able to tie the regulatory requirements listed in the reference section of this ISA back to the content discussed in NUREG/CR-6314
3. Be familiar with the Design Control related contents in ASME NQA-1
4. Demonstrate knowledge of the 10 CFR 72.48 process
5. Describe the areas and types of design documents to be inspected under Design Development.
6. Understand the controls that are in place for design modifications, including the types of design documents that control the modification process.

TASKS:

1. Read NUREG/CR-6314, section 4.2 Design Controls. Tie each part of this section back to the regulatory requirements listed in the part.
2. Read in detail, ASME NQA-1, Part I, Requirement 3, "Design Control," and Part II, Subpart 2.7, "Quality Assurance Requirements for Computer Software for Nuclear Facility Applications." Additionally, read in detail the associated subpart in Part III for this requirement.
3. Review 10 CFR 72.48.
4. Review RG 3.72, including Appendices A and B.
5. Be familiar with the remainder of the reference material in this ISA.
6. At a CoC holder's facility, gain a general understanding of the CoC holder's design control program through a combination of discussions with a qualified inspector and interviews of CoC holder engineering personnel. Review a sample of design documents such as project plans, engineering changes, drawings, design reviews, and quality computer code verification and validations (V&Vs).
7. Review a 10 CFR 72.48 screening and evaluation.
8. Locate and become familiar with the legacy ISG information provided in the reference section of this ISA. Meet with your supervisor or the person designated to be the resource for this activity on their applicability.
9. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-6.

(ISA-Technical-7) Fabrication Controls Part I (Material Procurement,
Commercial Grade Dedication, Part 21 Reports)

PURPOSE:

The purpose of this activity is to familiarize you with one of the major elements of Fabrication Controls: Material Procurement, which includes Commercial Grade Dedication (CGD) as a method for procuring commercial materials for important-to-safety applications. In addition, Part 21 Reports is included in this activity as it directly relates to procured materials that are identified as containing defects that could create a substantial safety hazard. This activity will familiarize you with the documents to view, and the interviews to conduct to ensure successful implementation of Fabrication Controls by licensees.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"
2. 10 CFR Part 71, Subpart H, "Quality Assurance"
3. 10 CFR Part 72, Subpart G, "Quality Assurance"
4. 10 CFR Part 21, "Reporting of Defects and Noncompliance"
5. ASME NQA-1 (Latest NRC Endorsed Revision), "Quality Assurance Requirements for Nuclear Facility Applications,"
6. RG 1.164, "Dedication of Commercial-Grade Items for Use in Nuclear Power Plants," Current Revision
7. RG 1.231, "Acceptance of Commercial-Grade Design and Analysis Computer Programs Used in Safety-Related Applications for Nuclear Power Plants," Current Revision
8. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packagings used in Transport of Radioactive Material,"
9. EPRI Technical Report 1025243, "Plant Engineering: Guideline for the Acceptance of Commercial-Grade Design and Analysis Computer Programs Used in Nuclear Safety-Related Applications," Revision 1, issued December 2013
10. RIS 18-05, "Supplier Oversight Issues Identified During Recent NRC Vendor Inspections"
11. IN 18-11, "Kobe Steel Quality Assurance Record Falsification"

12. IN 16-01, "Recent Issues Related to the Commercial Grade Dedication of Allen Bradley 700-RTC Relays"
13. IN 14-11, "Recent Issues Related to the Qualification and Commercial Grade Dedication of Safety-Related Components."
14. GL 91-05, "Licensee Commercial-Grade Procurement and Dedication Programs"
15. EPRI 3002002982, "Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications," Revision 1 to EPRI NP-5652 and TR-102260, September 2014
16. IP 43004, "Inspection of Commercial-Grade Dedication Programs," Current Revision
17. Section 206, "Noncompliance" of the Energy Reorganization Act of 1974
18. RG 1.234 "Evaluating Deviations and Reporting Defects and Noncompliance Under 10 CFR Part 21," Current Revision
19. NUREG-0302, "Remarks Presented (Questions/Answers Discussed) at Public Regional Meetings to Discuss Regulations (10 CFR Part 21) for Reporting of Defects and Noncompliance," Revision 1, July 1977 (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0302/>)
20. NEI 14-09, Revision 1, "Guidelines for Implementations of 10 CFR Part 21 Reporting of Defects and Noncompliance," February 2016
21. NEI 14-05-A, Revision 1, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," September 2020
22. IN 96-40, "Deficiencies in Material Dedication and Procurement Practices and in Audits of Vendors"
23. RIS 2010-05, "Applicability of 10 CFR Part 21 Requirements to Applicants for Standard Design Certifications," May 24, 2010
24. IN 87-33, "Applicability of 10 CFR Part 21 to Nonlicensees"
25. IN 91-39, "Compliance with 10 CFR Part 21, "Reporting of Defects and Noncompliance"
26. IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," Current Revision
27. If available, CoC Holder procurement package and approved vendor list

EVALUATION CRITERIA:

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

1. State the purpose of CGD.

2. State the four acceptable methods of dedicating commercial grade items. Be able to describe key characteristics, special concerns, and limitations of each method. Name the regulatory source for these concerns and limitations.
3. Describe what is meant by “critical characteristics” and their importance to the CGD process.
4. Describe examples of critical characteristics associated with mechanical, electrical, and software based SSCs.
5. Describe the difference between like-for-like and equivalent replacement.
6. Describe EPRI guidance on sampling.
7. Understand what type of documentation needs to be reviewed while inspecting Procurement.
8. Given a Purchase Order, explain what documents you would request and review to verify traceability of an Important to Safety, Category A item.
9. Be able to discuss what is the importance of each document within a procurement package.
10. Explain what an approved suppliers list is and how suppliers are added and maintained on it. Describe the responsibilities of a dedicating entity with a regard to Part 21 reporting and record keeping.
11. Be able to discuss the requirements of Part 21, its legal basis and applicability to licensees, CoC Holders, and vendors. Know the key sections and definitions of Part 21, be able to provide citations.
12. Know the phases a Part 21 evaluation progresses through. Describe the actions required of a CoC holder/licensee, and the time allotted for those actions.
13. Understand the differences between a deviation and a defect and the Coc holder’s/licensee’s responsibility toward each. Describe the five (5) definitions for a defect. Know how they are related and how each is used by a CoC holder/licensee to conclude a condition is or is not a defect.
14. Know the actions that must be taken by a CoC holder/licensee at the conclusion of a Part 21 evaluation. (21.21)
15. Identify the attributes you will be looking for, to demonstrate compliance with Part 21 during a tour of the CoC Holder/Licensee facilities.
16. Identify the records that the CoC holder/licensee should have, to demonstrate compliance with this regulation.
17. Know how Part 21 would be applied to an international CoC holder and their vendors. Any limitations or special considerations in enforcement of such requirements on an international vendor.

TASKS:

1. Review the references to understand the principles discussed in the evaluation criteria.
2. Read, in detail, ASME NQA-1, Part I, Requirement 4, "Procurement Document Control," Requirement 7, "Control of Purchased Items and Services" and the external audit provisions of Requirement 18, "Audits." Additionally, read in detail the associated subparts in Part III for these two requirements.
3. Review Enclosure 1 to GL 91-05 for specifics of inspection findings related to CGD programs.
4. Demonstrate your understanding of CGD Program through discussions with a qualified inspector.
5. Evaluate a dedication package (e.g., technical evaluation, critical characteristics, acceptance criteria, acceptance methods). Discuss your observations with a qualified inspector.
6. Evaluate a procurement package (e.g., Purchase Order, Certificate of Conformance, Receipt and Inspection Records, Test Reports, etc.) and compare it to the requirements for the procured material or component in the dry storage system or transportation packaging SAR and/or drawings. Upon evaluation, discuss with your supervisor or a qualified inspector any observations you may have. Demonstrate if an Important to Safety Item is traceable throughout the whole package.
7. Review a sample of a CoC holder's approved vendor list and discuss with a qualified inspector the types of approved vendors (e.g., Category A, B, etc.), requirements for addition on the list for those categories, and requirements for maintaining a supplier on the list.
8. Discuss the requirements of Part 21 with your supervisor or qualified inspector to gain an understanding of these regulations.
9. Meet with your supervisor or an inspector to discuss any questions that you may have as a result of this activity and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-7.

(ISA-Technical-8) Fabrication Controls Part II (Fabrication and Assembly,
Test and Inspection, Measuring and Test Equipment)

PURPOSE:

The purpose of this activity is to familiarize you with the three other elements of Fabrication Controls: Fabrication and Assembly, Test and Inspection, and Measuring and Test Equipment (M&TE). Fabrication and Assembly includes inspection areas such as welding, machining, handling and storage, and protective environments. This activity will familiarize you with the documents to view, and the interviews to conduct to ensure successful implementation of Fabrication Controls by licensees.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"
2. 10 CFR Part 71, Subpart H, "Quality Assurance"
3. 10 CFR Part 72, Subpart G, "Quality Assurance"
4. 10 CFR Part 21, "Reporting of Defects and Noncompliance"
5. ASME NQA-1 (Most recent NRC Endorsed Version), "Quality Assurance Requirements for Nuclear Facility Application"
6. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packagings used in Transport of Radioactive Material"
7. ASME Boiler and Pressure Vessel Code (applicable parts of Sections III, V, and IX)
8. AWS Welding Handbook, "Welding and Cutting Science and Technology"
9. ASNT Handbook, Volume 1, "Leak Testing"
10. ANSI N14.5, "For Radioactive Materials – Leakage Tests on packages for Shipment"
11. IN 16-04, "ANSI N14.5-2014 Revision and Leakage Rate Testing Considerations"
12. ASNT Recommended Practice No. SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing"
13. American Concrete Institute (ACI)-349, "Code Requirement for Nuclear Safety-Related Concrete Structures"
14. ACI-318, "Building Code Requirements for Structural Concrete"

15. ACI-301, "Specification for Structural Concrete"
16. ASTM C94, "Standard Specification for Ready-Mixed Concrete"
17. ASTM C31, "Standard Practice for Making and Curing Concrete Test Specimen in Field"
18. ASTM-C172, "Standard Practice for Sampling Freshly Mixed Concrete"
19. IN 08-17, "Construction Experience with Concrete Placement"
20. BL 96-04, "Chemical, Galvanic, or Other Reactions in Spent Fuel Storage and Transportation Casks"

EVALUATION CRITERIA:

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

1. Be able to discuss the different kinds of welding and nondestructive examination processes applicable to fabrication of DSSs and transportation packagings.
2. Demonstrate knowledge of welding and nondestructive examination (NDE) codes and standards.
3. Be able to describe the codes and standards for qualification of welding and NDE personnel.
4. Demonstrate knowledge for concrete placement and testing codes and standards.
5. Be knowledgeable on the expectations located within NUREG/CR-6314's Fabrication Controls section and any associated regulatory requirements.
6. Demonstrate an understanding of the requirements and guidance on M&TE use and calibration.
7. Be familiar with the requirements regarding the storage of quality materials.

TASKS:

1. Review industry codes and standards used to govern welding and concrete fabrication, NDE, and qualification of welders and test personnel.
2. Review the AWS Welding Handbook. Become familiar with its chapters, and skim the contents of Part IV, "Quality, Testing Standards, and Methods."
3. Read, in detail, ASME NQA-1, Part I, Requirement 8, "Identification and Control of Items," Requirement 9, "Control of Special Processes," Requirement 10, "Inspection," Requirement 11, "Test Control," Requirement 12, "Control of Measuring and Test Equipment," Requirement 13, "Handling, Storage, and Shipping," and Requirement 14, "Inspection, Test, and Operating Status." Additionally, read in detail the associated subparts in Part III for these seven requirements.

4. Discuss the typical DSS or transportation packaging licensing requirements with a qualified inspector for testing the confinement boundary and where these requirements may be found.
5. Discuss the purpose and enforceability of industry standards, as a regulator, with a qualified inspector.
6. If possible, at a fabrication facility with a qualified inspector, observe welding and NDE activities. Review and discuss with the qualified inspector a sample of welding and NDE documents, such as the welding procedure specification and associated procedure qualification report for welding observed and the NDE procedure associated with the examination activity observed (e.g., dye penetrant, magnetic particle, ultrasonic, or radiographic examination).
7. While observing welding and NDE activities, select a sample of three M&TE being used by CoC holder personnel. Review and discuss with a qualified inspector whether the M&TE is currently in calibration and review the latest calibration certificates to verify they were properly calibrated for the measurements performed.
8. If possible, at a CoC holder/licensee site with a qualified inspector, observe the concrete rebar placement, concrete placement, and concrete testing.
9. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-8

(ISA-Technical-9) Maintenance Controls

PURPOSE:

The purpose of this activity is to familiarize you with the two components of inspecting Maintenance Controls: Maintenance Activities, and Tools and Equipment. This activity is applicable only to maintenance of transportation packagings under 10 CFR Part 71, which typically occurs at a minimum, on an annual basis, but also potentially prior to shipment. Maintenance may be required for a limited number of Part 72 DSSs, but that activity would be inspected by ISFSI inspectors qualified under Appendix B3 of this IMC. The maintenance activities inspected are similar in nature to fabrication activities, therefore, this activity focuses on specific maintenance activities not performed during fabrication of the transportation packaging.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NUREG/CR-6314, "Quality Assurance Inspections for Shipping and Storage Containers"
2. 10 CFR Part 71, Subpart H, "Quality Assurance"
3. 10 CFR 71.87, "Routine determinations."
4. Latest Revision of RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material"
5. ASME NQA-1 – "Quality Assurance Requirements for Nuclear Facility Applications" (Latest endorsed version)
6. Sample Part 71 CoC and associated SAR, Chapter 8 (which includes Maintenance Requirements), and the CoC holder's operation/maintenance manual or a user's maintenance procedure (if available).

EVALUATION CRITERIA:

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

1. Be familiar with the contents under Maintenance Controls within NUREG/CR-6314.
2. Be familiar with the regulatory requirements associated with Maintenance Controls.
3. Be able to explain how 10 CFR 71.87 relates to maintenance of transportation packagings.
4. Understand the areas to be inspected under Maintenance Activities.

5. Understand the areas to be inspected under Tools and Equipment.
6. Be able to discuss the similarities and differences between inspecting Fabrication and Maintenance Activities.

TASKS:

1. Review the Maintenance Controls section of NUREG/CR 6314.
2. Review the applicable regulations mentioned within the Maintenance Controls section of NUREG/CR6314.
3. Review 10 CFR 71.87 and compare the requirements to those in the sample SAR, Chapter 8 and a user's maintenance procedure (if available).
4. Scan RG 7.10 to identify the applicable criteria for maintenance controls.
5. If available, review a user's maintenance procedure, and the sample Part 71 CoC SAR. Compare the two and have a discussion with your mentor/supervisor about the similarities or differences identified.
6. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criterion section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Item ISA-Technical-9

(ISA-Technical-10) Counterfeit, Fraudulent, and Suspect Items

PURPOSE:

The purpose of this activity is to provide you with an understanding of the regulations and guidance in place for CoC holders or licensees to prevent, identify, and mitigate Counterfeit, Fraudulent, and Suspect Items (CFSI) risks. In addition, the guidance for NRC evaluation of potential CFSI identified is provided.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 2 hours

REFERENCES:

1. 10 CFR Part 21, "Reporting of Defects and Noncompliance"
2. Regulatory Information Summary 2015-08, "Oversight of Counterfeit, fraudulent, and Suspect Items in the Nuclear Industry"
3. Electric Power Research Institute (EPRI) Technical Report (TR)-1019163, "Plant Support Engineering: Counterfeit, Fraudulent and Substandard Items- Mitigating the Increasing Risk," Revision 1, (ADAMS Accession No. ML 14245A079
4. GL-89-02, "Actions to Improve the Detection of Counterfeit and Fraudulent Marketed Products"
5. <https://www.nrc.gov/about-nrc/cfsi/guidance.html>
6. [https://nuclepedia.usalearning.gov/index.php/Counterfeit, Fraudulent, and Suspect Items](https://nuclepedia.usalearning.gov/index.php/Counterfeit,_Fraudulent,_and_Suspect_Items)

EVALUATION CRITERIA:

Upon completion of this activity, you will be asked to demonstrate your understanding of the CoC holder's or licensee's requirements and response to CFSI by successfully addressing the following:

1. Discuss which key elements of a CoC holder's or licensee's QA program will support prevention, identification, and mitigation of CFSI risks.

TASKS:

1. Review the regulations and guidance that address CFSI and be able to define CFSI. Review NRC and EPRI guidance in Reference 2 and 3 on CFSI and be able to discuss the relationship between a substandard basic component and CFSI.

2. Review the guidance on the website in Reference 5 and discuss the implications of RIS 2015-08 on your inspection program.
3. Read GL-89-02
4. Meet with your immediate supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature in the line item for Basic-Level Certification Signature Card Item ISA-Technical-10.

PART II. TECHNICAL-LEVEL ON-THE-JOB ACTIVITIES

The on-the-job training (OJT) activities require you to conduct inspection-related work, under supervision, at a CoC Holder/Licensee facility. They are designed to allow you to observe and perform key inspector tasks under controlled circumstances. Like the ISAs, each of the OJT activities informs you of the importance of the activity, the time that might be needed to complete the assignment, and the expectations for successful completion.

Before beginning the activities in this section, you must successfully complete the course work for site access. You can do this in one of two ways: by completing the NRC site access course and the site-specific requirements for access, or by completing the site access requirements at a site. Your immediate supervisor will discuss with you the best way to meet the site access requirements.

You should complete three individual types of inspections: (1) Part 72 Design, (2) Part 72 Fabrication, and (3) Part 71 with Transportation Packaging On-Site.

If you are unable to participate in each type of inspection, you may substitute another SAT inspection.

- You should complete all practical parts of each activity.
- Your supervisor will act as a resource for help in completing each activity. You should discuss any questions about how a task must be done or how the guidance is to be applied. Your immediate supervisor may designate a fully qualified inspector to work with you in completing the various activities and to sign off the OJT as you complete it.
- You are responsible for keeping track of the tasks completed. You should complete all aspects of an OJT activity before your immediate supervisor's evaluation.

(OJT-1, -2, and -3) Inspection Activities

PURPOSE:

The purpose of this activity is to familiarize you with inspection tasks commonly performed by an inspector. This OJT will prepare you to independently plan and conduct the routine inspection program, as defined in the applicable IMC.

COMPETENCY AREA: INSPECTION
COMMUNICATION
TEAMWORK
SELF-MANAGEMENT

LEVEL OF EFFORT: Note: The objective of this activity is to make sure that you have experienced the full range of inspection activities. The time needed to complete the tasks will depend on your proficiency.

REFERENCES:

1. IP 60851, "Design Control of ISFSI Components"
2. IP 60852, "ISFSI Component Fabrication by Outside Fabricators"
3. IP 60853, "On-Site Fabrication of Components and Construction of an Independent Spent Fuel Storage Installation"
4. IP 60857, "Review of 10 CFR 72.48 Evaluations"
5. IP 86001, "Design, Fabrication, Testing, and Maintenance of Transportation Packages"
6. IMC 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor-Related Greater-Than-Class C Waste at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings"

EVALUATION CRITERIA:

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

1. Understand the routine inspection process.
2. Describe the contents and purpose of the facility-specific inspection plan.
3. Describe the purpose of the inspection planning call.
4. Develop a specific inspection plan and provide it to your immediate supervisor.
5. Describe the purpose and contents of a specific inspection plan.

6. Discuss the documents to be reviewed, including their content and purpose, before an inspection.
7. Describe the activities accomplished by the staff during the inspection(s) and their purpose.
 - a. entrance meeting
 - b. management briefing and exit prebriefing (as applicable) of CoC holder/licensee management
 - c. exit meeting

TASKS:

1. Review IMC 2690 Appendix A and B to understand how the staff's inspection effort fits into the overall inspection program.
2. Participate in an inspection planning call to the CoC holder or licensee.
3. Participate in developing the inspection-specific plan. Review the following documents to understand how they provide background information, current issues, and areas for emphasis and support for the inspection effort you plan to accomplish:
 - a. previous inspection reports
 - b. appropriate CoC holder or licensee documents
 - c. applicable inspection procedures
 - d. other applicable documents (e.g., event reports, information notices, and bulletins)
4. Observe and participate in an entrance meeting.
5. During a planned inspection, perform the following tasks:
 - a. observe implementation of inspection procedures
 - b. observe interviews and discussion with facility personnel
 - c. observe facility work activities
 - d. review documentation and records
 - e. discuss inspection results with the lead inspector
6. Observe and participate in a briefing to NRC management.
7. Observe and participate in an exit prebriefing of licensee management (as applicable).
8. Observe and participate in an exit meeting.
9. Perform the following tasks in an inspection:

- a. draft a portion of the inspection-specific plan
- b. conduct activities described in Task 6 above, as appropriate
- c. conduct a portion of the following:
 - i. entrance meeting
 - ii. briefing of NRC management
 - iii. prebriefing of CoC holder or licensee management (as applicable)
 - iv. exit meeting

10. Meet with your supervisor or the person designated to be the resource for this activity to discuss the items listed in the evaluation criteria section.

DOCUMENTATION: You should obtain your immediate supervisor's or designee's signature on Items OJT-1, -2, and -3.

Form B-1: SAT Inspector Technical
Proficiency Signature Card and Certification

Inspector's Name:	Employee Initials Date	Supervisor's Signature/Date
<u>Part B. Technical Proficiency Training Courses</u>		
Concrete Technology and/or Codes Course (E-117)		
Welding Technology and/or Codes Course (E-901)		
Nondestructive Examination Technology and/or Codes Course (E-306)		
H-308, Transportation of Radioactive Materials		
Independent Spent Fuel Storage Installations Self-Study Course (F-220S)		
<u>Part I. Technical Proficiency Individual Study Activities</u>		
(ISA-Technical-1) ISFSI and Transportation Packaging Inspection Procedures		
(ISA-Technical-2) Quality Assurance Program		
(ISA-Technical-3) ISFSI & COC Holder Licensing		
(ISA-Technical-4) Management Controls Part I (QA Policy & Document Control)		
(ISA-Technical-5) Management Controls Part II (Corrective Action, Nonconformance Controls, and Audits)		
(ISA-Technical-6) Design Controls		
(ISA-Technical-7) Fabrication Controls Part I (Material Procurement, Commercial Grade Dedication, Part 21 Reports)		
(ISA- Technical-8) Fabrication Controls Part II (Fabrication and Assembly)		
(ISA-Technical-9) Maintenance Controls		
(ISA-Technical-10) Counterfeit, Fraudulent, and Suspect Items		
<u>Part II. Technical-Level On-the-Job Activities</u>		
(OJT-1, -2, and -3) Inspection Activities		

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

Supervisor's Signature: _____ Date: _____

Form B-2: Technical Proficiency Level Equivalency Justification

Description of Qualification Requirement	Identify equivalent training and experience for which the inspector is to be given credit.
Part B: Technical Proficiency Training Courses	
Concrete Technology and/or Codes Course (E-117)	
Welding Technology and/or Codes Course (E-901)	
Nondestructive Examination Technology and/or Codes Course (E-306)	
H-308, Transportation of Radioactive Materials	
Independent Spent Fuel Storage Installations Self-Study Course (F-220S)	
Part I. Technical Proficiency Individual Study Activities	
ISA-1 ISFSI and Transportation Packaging Inspection Procedures	
ISA-2 Quality Assurance Program	
ISA-3 ISFSI & COC Holder Licensing	
ISA-4 Management Controls Part I (QA Policy & Document Control)	
ISA-5 Management Controls Part II (Corrective Action, Nonconformance Controls, and Audits)	
ISA-6 Design Controls	
ISA-7 Fabrication Controls Part I (Material Procurement, Commercial Grade Dedication, Part 21 Reports)	
ISA-8 Fabrication Controls Part II (Fabrication and Assembly, Test and Inspection, Measuring and Test Equipment)	
ISA-9 Maintenance Controls	
ISA-10 Counterfeit, Fraudulent, and Suspect Items	
Part II. Technical-Level On-the-Job Training Activities	
(OJT-1, -2, and -3) Inspection Activities	

Supervisor's Signature: _____ Date: _____

Attachment 1: Revision History for IMC 1246, Appendix B2

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
N/A	ML053460017 05/25/06	Added additional guidance for qualification board conduct and documentation.	N/A	N/A
N/A	ML082180877 09/24/08 CN 08-027	Complete rewrite of IMC 1246 A06 and change title name. IMC 1246 A06 was also divided into two qualification journals (i.e., SFST project managers and technical reviewers, and SFST inspectors). A total of four documents were created during this revision; attachments were created within IMC 1246 A06 and new titles were assigned to these attachments. The section and title of this document should be the following: IMC1246 B06, Attachment 2, "Office of Nuclear Material Safety and Safeguard Qualification Journal for Spent Fuel Storage and Transportation Inspector."	N/A	ML082180876
N/A	ML11230B314 10/26/11 CN 11-022	Combined Appendix A06, Attachment 2 with Appendix B06, Attachment 2 and renamed as Appendix B2. Added "training requirements" section from Appendix A06, Attachment 2.	N/A/	ML112350554
	ML23249A183 10/02/23 CN 23-029	The document is a new update revision and revised to incorporate CFSI guidance.	N/A	N/A