MANUAL CHAPTER 1247 APPENDIX A

BASIC-LEVEL TRAINING AND CERTIFICATION JOURNAL FUEL FACILITY INSPECTOR

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Introduction

The inspector training and qualification program requires that you complete a variety of activities, each of which is designed to help you learn information or practice a skill that will be important to performing the job of an inspector. When you have completed the entire qualification process, you will have demonstrated each of the competencies that describe a successful inspector.

A competent inspector must develop competencies in the following four areas. More details of these areas are provided in Attachment 2 of IMC 1247:

Area 1 Understand the legal basis and the regulatory processes for achieving the NRC's regulatory objectives.

Area 2 Understand the technology and apply concepts in various technical areas to allow the NRC to carry out its overall responsibilities.

Area 3 Master the techniques and skills needed to collect, analyze, and integrate information using a safety focus to develop a supportable regulatory conclusion.

Area 4 Have the personal and interpersonal skills to carry out assigned regulatory activities either individually or as a member of a team.

Program Organization

The inspector qualification process has two levels. The first level is the Basic-Level. Basic-level activities are designed to help you develop an awareness of the role of the Agency, your role as an inspector, and the technology you will be inspecting. Successfully completing the Basic-Level work will provide you with a context for meaningful learning during on-site work and a foundation for in-depth learning at the next level. After successfully completing the Basic-Level activities, you will receive *Basic Inspector Certification* with supervisory approval.

With a *Basic Inspector Certification*, you can be assigned to perform limited scope inspection activities under an appropriate degree of detailed oversight and supervision. The scope of your assigned inspection activities will be controlled by your immediate supervisor. Typically, your supervisor will review your work in detail at specified points during the course of your qualification activities. You can be asked to conduct inspection activities and develop independent conclusions which you will discuss with the lead inspector. You will not be expected to describe official agency positions on evolving issues, or act as an official agency spokesperson. The emphasis in the inspector qualification program is on competencies. There is no set time for completing each segment of the program nor do the on-the-job activities specify an exact number of times you must practice a task. You must practice until you can perform inspector tasks successfully in accordance with the evaluation criteria. Therefore, the time needed to complete all of the requirements to receive a *Basic Inspector Certification* will vary based on your previous education, training, and experience. Most employees will require several months to complete the work to be eligible to achieve *Basic Inspector Certification.*

The second level of the qualification process is the Proficiency-Level, which has two parts. One part is General Proficiency activities, which are designed to develop your interpersonal and inspection skills. The second part is Technical Proficiency activities, which are designed to develop your technical expertise in one of the inspector classifications. The final activity in the Proficiency Level is to appear before a Qualification Board. You may work on the General and Technical Proficiency Journals at the same time. Successful completion of the Qualification Board will ensure that you have a sufficiently integrated understanding of the role of the Agency, the inspection program, and your role as an inspector to act independently in the field. Upon successful completion of all Proficiency Level activities, including the Qualification Board, you will receive *Full Inspector Qualification,* with Regional Administrator or Office Director approval. This is expected to be completed in two years. As a fully qualified Inspector you will be assigned the full scope of inspection activities to perform independently.

There are three Qualification Journals (Basic-Level, General Proficiency-Level and Technical Proficiency-Level) you will need to complete during the inspector qualification process. Each journal identifies the classroom requirements you must complete, and also provides the individual study activities and on-the-job learning activities you must complete. The signature cards and certifications, which you will use to document your progress as you move through the Basic- and Proficiency-Levels, can be found at the end of each journal. Each journal also contains a form to document the justification for accepting equivalent training or experience as a means of meeting an inspector qualification requirement. The signature cards, certification pages, and equivalency justification pages will become the permanent record of your completion of the inspector qualification program and will be placed in your official file.

Required Basic-Level Training Courses

These courses can be taken in any order, with the exception of G-104, which should be taken after you have completed the majority of the other work in this journal.

- Fuel Cycle Processes/Directed Self-Study (F-201 or F-201S)
- G-104, Expectations for Inspectors Seminar
- H-100, Site Access training
- Ethics Training - Web-based as part of Individual Study Guide (SG)-3
- Allegations Training - Web-based as part of SG-5
- MCA-101DC, Intro to Nuclear Materials Control an Accountability (Required for MC&A inspectors only)
- MCA-104DB, Introduction to Measurement Programs (Required for MC&A inspectors only)
- MCA-110, Basics of Nuclear Materials Accountability (Required for MC&A inspectors only)

- MCA- 120, Basics of Nuclear Materials Control (Required for MC&A inspectors only)
- F-101S, Nuclear Criticality Safety
- (24 hrs) OSHA HAZWOPER or iLearn Health & Safety Training Suite[1] (See ML100200563, for details of equivalent iLearn training modules).

[1] The 24hr OSHA HAZWOPER training requirement is intended for qualifying individuals who do not have adequate prior experience or training. Qualifying individuals with adequate experience must use the equivalency examination or equivalent experience justification process to alternatively opt for the iLearn Health & Safety training suite.

Interpersonal Skills Training

The Interpersonal Skills Training Courses listed below are not required until the Proficiency Level for Full Inspector Qualification. However, they can be taken at any time during the inspector qualification process. Successful completion of any of these courses should be documented on the Signature Card in the General Proficiency Qualification Journal.

- Effective Communication for NRC Inspectors
- Gathering Information for Inspectors through Interviews

Technical Training

Technical training may be started at this level, provided that the training does not identify the successful completion of the Basic-Level as a prerequisite

Basic-Level Individual Study Activities

The Individual Study Guides (SGs) 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 Guide 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. (Of course, the times are estimates. You may need a little more or a little less time - but use the level of effort as an estimate.) The **evaluation criteria** are listed up front so that you will review them first and better understand what you are expected to achieve as a result of completing the activity. Use the evaluation criteria to help you to focus on what is most important. The **tasks** outline in detail the things you must do in order successfully address the evaluation criteria.

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

- SG-3 (Inspector Objectivity, Protocol, and Professional Conduct), and SG-5 (Allegations) should be completed prior to going on a site visit to a licensee facility or inspection accompaniment.

- The first three SGs should be completed early during qualification, especially for individuals new to the NRC. Becoming familiar with the Agency, the internal and external web sites, and your overall role as an inspector is important for successfully completing many of the remaining SGs. You should also become familiar with the content of the remaining SGs so that you can complete the associated activities as opportunities arise.

- Complete all parts of each SG.

- Your supervisor will act as a resource as you complete each SG. Your supervisor may also designate other fully qualified individuals to work with you as you complete the various SGs. Discuss any questions you may have about the content of anything you read with your supervisor or the person designated as a resource.

- You are responsible for keeping track of what tasks you have completed. Be sure to complete all the tasks in each SG before meeting with your supervisor or the person designated as a resource for evaluation.

Basic-Level Individual Study Guides

Basic-Level Individual Study Guide

TOPIC: (SG-1) History and Organization of the 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 today's NRC staff functions. During this activity you will review the organization of the agency and its staff and the relationships between the major offices. This SG should be completed early in the qualification process for newly hired staff.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. Title 10 of the *Code of Federal Regulations* (10 CFR)
2. NUREG-1350, "USNRC Information Digest"
3. NUREG/BR-0175, "A Short History of Nuclear Regulations, 1946-2009," Rev. 2, October 2010
4. "Our History" http://www.nrc.gov/about-nrc/history.html

EVALUATION CRITERIA: Upon completion of this activity, you will demonstrate your 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 briefly describe the function of the following: the Commission; the Office of the Inspector General; Office of the Secretary of the Commission (SECY); the Atomic Safety Licensing Board; the Advisory Committee on Reactor Safeguards; Commission staff and program offices, including Chief Information Officer, Chief Financial Officer, Executive Director for Operations.
4. Describe your Region's or Office's organization and key management positions.

5. Discuss the relationship between NRC and the Department of Energy (DOE).

TASKS:

1. Obtain the reference material listed above. Some documents may be available through the regional public affairs office. Electronic copies can be found on the NRC External Website in the Electronic Reading Room.

2. Read the reference material to gain an understanding of the principles discussed in the evaluation criteria.

3. Review and discuss the evaluation criteria with your supervisor.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-1

Basic-Level Individual Study Guide

TOPIC: (SG-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. Objectivity and professionalism are essential to the Agency fulfilling 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 SG will help you understand NRC procedures, policies, and expectations related to inspector conduct. This activity will also help you develop the professional conduct that you will need to be an effective NRC inspector. You must complete this SG prior to going on a site visit or inspection accompaniment.

COMPETENCY AREAS:
INSPECTION
SELF-MANAGEMENT

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. MD 7.5, "Ethics, Counseling and Training"
2. Inspection Manual Chapter (IMC) 1201, "Conduct of Employees"
3. NUREG/BR-0075, "Field Policy Manual," (ML041170225) Policy No.10, "Conduct of Employees" and Policy No.13, "Witnessing of Unsafe Situations"
4. Regional or Office guidance related to inspector/employee conduct (Regional Office Instructions [ROI] are available on the region's SharePoint site.)

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

1. What are the expectations of NRC employees regarding:
   a. alcohol and illegal drugs?
   b. official business and personal relationships?
   c. business partnerships with licensees?
   d. work habits and professional demeanor?

2. Describe the restrictions regarding the following specific employee activities which 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 (OGE) 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. Explain the actions expected of NRC personnel when they identify unsafe work practices or violations which could lead to an unsafe situation.

5. Describe the overall requirements used by NRC managers to verify the performance and objectivity of individual inspectors and team leaders during on-site activities at fuel facilities.

6. Describe how NRC managers with responsibility for oversight of inspectors assess the performance and objectivity of those inspectors. Identify the specific areas that NRC management should focus on in assessing inspectors.

7. Describe the expectations for inspector conduct in a fuel facility control room during normal, transient, and emergency conditions. Identify any differences among facilities.

8. Describe what NRC employees are 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 web-based Ethics Training. To access the training, select Ethics on NRC's Internal Website. Print the completion record at the end of the on-line ethics course. This must be presented to your supervisor as evidence that you have completed the course.

2. Read the material listed in the Reference section of this activity.

3. Identify, locate, and review your Region's or Office's policy guidance on inspector/employee conduct. Some of this guidance may be located in directives which describe the duties and responsibilities of specific positions (e.g., resident staff or project engineer guidance). You should closely review the guidance applicable to your position. For assistance with identifying and locating these materials see your technical mentor or branch chief.

4. Review and discuss the evaluation criteria with your supervisor or designated ethics expert. Demonstrate your understanding of the NRC's expectations of inspector conduct and protocol by explaining the answers to the questions listed in the Evaluation Criteria section of this activity. Regional Counsel is considered one of the ethics experts.

5. Meet with your supervisor or other designated ethics expert to discuss the evaluation criteria and any questions you may have as a result of this activity.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-2

Basic-Level Individual Study Guide

TOPIC: (SG-3) Fitness for Duty (FFD) Rule

PURPOSE: The purpose of this activity is to provide you with an understanding of the Fitness for Duty Rule. NRC licensees authorized to possess (Category 1 fuel facilities) use or transport formula quantities of strategic special nuclear material are required to have Fitness-for-Duty programs which include drug and alcohol testing procedures and other measures to assure that the licensee staff are capable of operating the facilities safely.

COMPETENCY AREAS:
INSPECTION
SELF-MANAGEMENT

LEVEL OF EFFORT: 3 hours

REFERENCES:

1. Enforcement Manual, Chapter 7.15, "Enforcement Actions Involving Fitness-For-Duty (FFD)"
2. NRC External Website
3. 10 CFR Part 26

EVALUATION CRITERIA: Upon completion of this activity, you will demonstrate your understanding of the NRC's Fitness-for-Duty Rule by successfully addressing the following:

1. State the purpose of the NRC's Fitness for Duty Rule and which licensees are required to meet this rule.
2. Explain why the Fitness or Duty 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 Fitness for Duty Rule.

TASKS:

1. On the NRC's External Website, find information on "fitness for duty."
2. Read the information on the history of the NRC's Fitness for Duty Program.
3. Read the information on the Fitness for Duty Rule and Drug Testing Program guidance provided on the NRC's External Website.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-3

Basic-Level Individual Study Guide

TOPIC: (SG-4) Allegations

PURPOSE: The purpose of this activity is to provide you with the opportunity to practice handling an allegation from receipt of the allegation to final disposition. This Study Guide will help you to effectively interact with individuals bringing concerns to the NRC and to appropriately respond to those concerns. You must complete this SG prior to going on a site visit or inspection accompaniment.

COMPETENCY AREAS:
INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. MD 8.8, "Management of Allegations"
2. Regional Guidance or Office Guidance (if applicable)
3. NRC Form 613, "Disclosure of Alleger's Identity"
4. Allegation Guidance Memorandum 2004-002 (ML042150016)
5. Region or Office Allegation Coordinator
6. Office of Enforcement internal web page

EVALUATION CRITERIA: You will demonstrate your understanding of how to receive, process, and document an allegation by successfully completing allegation processing activities.

TASKS:

1. Complete the web-based training module on Allegations. Print the completion certificate at the end of the on-line allegations training. You must present the certificate to your supervisor as evidence that you have successfully completed the course.
2. Read the reference documents listed above for allegations.
3. Attend at least (2) allegation review boards (ARB) which include both fuel facility and reactor allegations on the agenda. For staff located external to the regional office, participation in the ARB may be via teleconference.

4. Meet with the Allegation Coordinator and have him/her brief you on the allegation process and the Allegation Coordinator's role in the process.

5. Review several allegation files (for closed allegations) and familiarize yourself with the documentation to the concerned individual. Due to limited resources staff located external to the regional office should review a minimum of one file.

6. Review how the original concern was brought to the NRC's attention.

7. Working with your supervisor or other designated individual, simulate receiving an allegation and complete the required documentation to have the concern presented at an ARB meeting. Discuss with your supervisor a proposed inspection/review of the simulated allegation.

8. Discuss with your supervisor the options available to the NRC to follow up on an allegation and the circumstances when each are appropriate.

9. 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 Allegation Coordinator.

10. Compare the inspection results or licensee investigation results to the original concern. Discuss with your supervisor how the inspection results addressed the concerns.

11. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-4

Basic-Level Individual Study Guide

TOPIC: (SG-5) NRC's Response to an Emergency 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. Emergency response is vital to the Agency, fulfilling one of its primary mandates - protecting the health and safety of the public. As a fully qualified inspector, you will be trained to perform specific emergency response activities. This SG will help you to understand how the NRC meets its emergency response mandate, and will begin to build the knowledge you will need later to successfully perform your assigned emergency response responsibilities.

COMPETENCY AREA: EMERGENCY RESPONSE

LEVEL OF EFFORT: 12 hours

REFERENCES:

1. NRC Internal Website - Program Office - Nuclear Security and Incident Response (NSIR)
2. MD 8.2, "NRC Incident Response Program"
3. Regional Guidance or Office Guidance (if applicable)
4. NUREG 0728, "NRC Incident Response Plan" (ML050750552) (Note: This NUREG is revised periodically to reflect changes to the agency's activities. Be sure to obtain the most recent version.)
5. NRC External Website

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. Identify the different modes of NRC emergency response and describe the purpose of each mode.
3. Discuss the capabilities (e.g., communications, information technology, etc.) provided in the Headquarters, Regional, and on-site emergency response facilities.

4. Recognizing that these positions may not apply to all nuclear facilities and that the NRC will act with all available resources to respond to an emergency, identify the responsibilities of the following during a declared emergency event:
   a. Resident staff
   b. Region-based staff
   c. Headquarters Staff
   d. Headquarters Operations Officer
   e. Licensee
   f. State and Local officials
   g. Site team
   h. Base Team

5. Discuss the responsibilities/roles of region-based inspectors when onsite when an emergency occurs.

TASKS:

1. Explore all aspects of NSIR's organization presented on the NRC's Internal Website.

2. Review your Region's or Office's policy guidance on emergency response.

3. Review the NRC Incident Response Plan in order to address the evaluation criteria. Go to Emergency Preparedness on the NRC External Website and become familiar with the available information.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-5

Basic-Level Individual Study Guide

TOPIC: (SG-6) The Enforcement Process and the Backfit Process

PURPOSE: The purpose of this activity is to provide you with an overview of the NRC's process for enforcing the Agency's rules and regulations. This SG will assist you in learning, understanding, and using the Agency's enforcement process for a wide variety of circumstances. It will also provide you with information on the internal activities used by the NRC for processing enforcement actions.

COMPETENCY AREAS:
REGULATORY FRAMEWORK
ASSESSMENT
ENFORCEMENT

LEVEL OF EFFORT: 24 hours

REFERENCES:

1. Enforcement Policy on NRC External Web site
2. Enforcement Guidance Documents
3. Office of Enforcement Annual Report for most recent year
4. Regional Guidance or Office Guidance (if applicable)
5. Technical Guidance, NOEDGAS, IMC 9900, "Operations - Notice of Enforcement Discretion for Gaseous Diffusion Plants"
6. Office of NMSS Policy and Procedure Letter 1-82, "10 CFR Part 70 Backfit Guidance" (ML052280266)

EVALUATION CRITERIA: Upon completion of the tasks in this activity, demonstrate your understanding of the Agency's enforcement policy by successfully completing the following items:

1. State the purpose of the NRC's enforcement policy.
2. Describe the legal basis from which the NRC derives its enforcement authority.
3. Compare and contrast the different severity levels of violations.

4. Identify the method used to determine the significance of a violation.

5. Identify the method used to assign a severity level to a violation.

6. State the purpose of an enforcement panel.

7. State the purpose of a pre-decisional enforcement conference.

8. Discuss the purpose and use of enforcement actions against an individual.

9. Discuss the purpose of civil penalties and how to determine the amount of the penalty.

10. Recognize the purpose of the escalated enforcement process flow chart.

11. Recognize the purpose of the different types of Orders and when they are used.

12. Recognize the purpose of an Exercise of Discretion.

13. Recognize the purpose of a Notice of Enforcement Discretion.

14. Define a backfit and what the attributes of a backfit are.

15. Discuss the NMSS Backfit Process Flow-chart.

TASKS:

1. Review the overall enforcement process outlined on the NRC External Website by selecting “Enforcement” from the list under “Public Meetings & Involvement.”

2. Locate the Enforcement Annual Reports in the Electronic Reading Room. Read the Introduction and Overview of the Office of Enforcement Annual Report for the most recent fiscal year.

3. Locate the Enforcement Manual on the NRC External Website. Bookmark it for future use and review the table of contents.

4. Review your Region’s or Office’s guidance on implementing the enforcement policy.

5. Meet with the enforcement specialist in your Region or Office to discuss the current enforcement guidance.

6. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

7. Review the Office of NMSS Policy and Procedure Letter 1-82, “10 CFR Part 70 Backfit Guidance” and your Region’s guidance on implementing the Backfit policy.

8. Observe an Enforcement Panel Meeting.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG- 6

Basic-Level Individual Study Guide

TOPIC: (SG-7) The Office of Investigations;

PURPOSE: The purpose of this activity is to familiarize you with the Office of Investigations (OI). As a fully qualified inspector you may be assigned to work with the Office of Investigations by providing technical support. This SG will help you to understand the role of OI, how it functions, and what your responsibilities will be if you are assigned to assist OI during the conduct of an investigation.

COMPETENCY AREAS:
INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 1 hour

REFERENCES:

1. MD 9.8, "Organization and Functions, Office of Investigations"
2. Regional Guidance or Office Guidance (if applicable)
3. Office of Investigations Website on the NRC External Website

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

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

TASKS:

1. Review MD 9.8.
2. Study the Office of Investigations website and associated organizational charts.

3. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-7

Basic-Level Individual Study Guide

TOPIC: (SG-8) Exploring the Fuel Facility Inspection Program

PURPOSE: The purpose of this Study Guide is for you to obtain a broad overall knowledge of the fuel fabrication facility program. Upon completion of this Study Guide, you will have the necessary background to go into a more detailed study of the inspection program, and learn the specifics of what an inspector does, why it is done, and how it is done.

COMPETENCY AREAS:
INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 30 hours

REFERENCES:

1. IMC 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program"
2. IMC 2630, "Gaseous Diffusion Plant Operational Safety and Safeguards Inspection Program"
3. IMC 2601, "Team Assessments of Fuel Cycle and Materials Licensees"
4. IMC 2604, "Licensee Performance Review"
5. IMC 2605, "Decommissioning Procedures for Fuel Cycle and Materials Licensees"
6. IMC 2681, "Physical Protection and Transport of SNM and Irradiated Fuel Inspections of Fuel Facilities"
7. IMC 2683, "MC&A Inspection of Fuel Cycle Facilities"
8. IMC 0616, "Fuel Cycle Safety and Safeguards Inspection Reports"
9. IMC 0300, "Announced and Unannounced Inspections"
10. IMC 0620, "Inspection Documents and Records"
11. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
12. Regional Guidance or Office Guidance (if applicable)

EVALUATION CRITERIA:

After completing this Study Guide, you will demonstrate your understanding of the fuel facility inspection program by successfully doing the following:

1. State when the NRC starts implementing the operating inspection program at a site, and how long it remains in effect.

2. State the three major program elements of the fuel facility inspection program and their specific functions. Identify how often resources are assigned to each program element.

3. State the criteria for declaring that an inspection is complete.

4. State the purpose of providing an inspection hours estimate in each procedure.

5. State the purpose and content of inspection reports.

6. State the general policy regarding an inspector's review and handling of non-NRC generated documents.

7. State the policy for announced and unannounced inspections and for controlling major inspection activities at a licensee's site.

8. Describe in general terms the implementation of the NRC's fuel facility assessment program.

NOTE: All inspection documents identified below can be obtained from the Electronic Reading Room on the NRC's Website.

TASKS:

1. Locate the referenced IMCs. Read each in detail and scan the appendices to become aware of the organization of the inspection program including its major parts.

2. Locate IMC 0616, "Fuel Cycle Safety and Safeguards Inspection Reports." Read the manual chapter to obtain a general understanding of the objectives of an inspection report; become familiar with the terminology, definitions, and the format of an inspection report; and have a general understanding of how inspection "findings" are addressed.

3. Locate IMC 0330, "Guidance For NRC Review of Licensee Draft Documents" and IMC 0620, "Inspection Documents and Records."

Scan the two manual chapters to obtain a general knowledge of the types of documents that will be encountered during an inspection and the NRC policy regarding how these documents should be handled.

4. Locate IMC 0300, “Announced and Unannounced Inspections.” Scan the manual chapter and determine the difference between announced and unannounced inspections and when each would be used.

5. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-8

Basic-Level Individual Study Guide

TOPIC: (SG-9) Exploring the Nuclear Materials Events Database (NMED)

PURPOSE: The purpose of this activity is to introduce you to an available resource you might find useful as an inspector.

COMPETENCY AREAS: INFORMATION TECHNOLOGY
INSPECTION
COMMUNICATION

LEVEL OF EFFORT: 1 Hour

REFERENCES: NMED Internal Website

EVALUATION CRITERIA: There are no specific evaluation criteria for this activity. Use your supervisor or other Agency personnel as a resource as you complete this activity.

TASKS:

1. Open your web browser. Locate the NMED website on the NRC internal webpage. Register for access for the NMED database.

2. Search events for three facilities and read in detail three reports for each facility.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-9

Basic-Level Individual Study Guide

TOPIC: (SG-10) Incident Inspection Team (IIT) Activities, Augmented Inspection Team (AIT), and Special Inspection Team (SIT)

PURPOSE: The purpose of this activity is to familiarize you with the actions taken by the NRC in response to incidents that do not require activation of the NRC Incident Response Plan. As a fully qualified inspector, you may be assigned to an IIT, AIT or SIT inspection activity. This SG will help you to understand how the NRC implements this program, what your responsibilities will be if you are assigned to a team, what the differences are between an IIT, AIT and an SIT, and how this program differs from the NRC Incident Response Program.

COMPETENCY AREA: INSPECTION

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. Regional Guidance or Office Guidance (if applicable)
2. MD 8.3, “NRC Incident Investigation Program”
3. Inspection Procedure (IP) 93800, “Augmented Team Inspection”
4. IP 93812, “Special Inspection”

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

1. State the purpose of the NRC’s Incident Investigation Program.
2. Describe what an IIT is and its purpose.
3. Describe what an AIT is and its purpose.
4. Describe what a SIT is and its purpose.
5. Describe how the Incident Investigation Program is different than the Incident Response Program.

TASKS:

1. Review MD 8.3. MDs can be found on the NRC Internal Website.
2. Explore all aspects of the Incident Investigation Program presented on the NRC's Internal Website.
3. Review your Region's or Office's guidance on IIT, AIT and AIT activities.
4. Meet with your supervisor, or the person designated to be your resource for this activity, and discuss the answers to the questions listed under the Evaluation Criteria.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-10

Basic-Level Individual Study Guide

TOPIC: (SG-11) Understanding How the Commission Operates

PURPOSE: The NRC Commissioners establish the approach 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. Since Commission decisions can have a significant impact on the conduct of inspection activities, inspectors should be familiar with the direction-setting and policy-making activities of the Commission.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES: NRC External Website

EVALUATION CRITERIA: At the completion of this activity, you should be able to:

1. Locate Commission-related documents on the internal and external agency websites.
2. Discuss how staff requirements memoranda are used by the Commission to direct the staff.

TASKS:

1. Read about the Commission's "Policy Making" activities under the heading of "About NRC."
2. Read about the different kinds of decision documents issued by the Commission.
3. Find and read Chairman Meserve's speech given on 12/11/2001 about "NRC Programs and Processes for Safety Oversight."
4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-11

Basic-Level Individual Study Guide

TOPIC: (SG-12) Organization and Content of the NRC Inspection Manual

PURPOSE: The purpose of this activity is to introduce you to the contents and organization of the NRC Inspection Manual, and to how those contents relate to inspection programs, particularly the operating fuel facilities inspection program. As an inspector, you will be implementing an inspection program that is defined by a manual chapter and implemented by its associated inspection procedures. This SG will help you to identify and locate inspection procedures that are used in the fuel facilities inspection program and to recognize the limitations associated with applying the guidance contained in the procedures. This activity will also introduce you to manual chapters that establish policy which will govern some of your actions in implementing the fuel facilities inspection program.

COMPETENCY AREAS: REGULATORY FRAMEWORK
INSPECTION

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. NRC Internal Home Page - Program Office - NMSS
2. NRC External Website
3. IMC 0040, "Preparing, Revising and Issuing Documents for the NRC Inspection Manual"

EVALUATION CRITERIA: After completing this activity you will demonstrate your understanding of the content and organization of the NRC Inspection Manual, and the limitations associated with applying the guidance contained 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. Manual Chapters
   b. Inspection Procedures
   c. Temporary Instructions
   d. Change Notices (CN)
3. Describe the numbering/identification process used for the documents in item 2 above.

4. Demonstrate the ability to locate copies of inspection documents contained in the NRC Inspection Manual on the internal and external websites.

TASKS:

1. Locate IMC 0040, “Preparing, Revising and Issuing Documents For The NRC Inspection Manual” from the Electronic Reading Room on the NRC External Website.

2. Read in detail the first six sections of IMC 0040, and scan the remaining portions of the document.

3. Locate the Table of Contents for the “NRC Inspection Manual.”

4. Scan the Table of Contents, noticing in particular the following:
   a. The date of issuance and latest change notice entered in the Table of Contents.
   b. Title associated with Part numbers.
   c. The number associated with each document.
   d. The issue date and CN number associated with each document.

5. Locate the section of the NRC Inspection Manual entitled “Technical Guidance.”

6. Scan the titles of the individual guidance documents.

7. Read the inspection procedures that apply to your inspector specialty area.

8. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-12

Basic-Level Individual Study Guide

TOPIC: (SG-13) NRC Interagency Agreements

PURPOSE: While conducting fuel facility 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 defective radioactive waste shipping trailers. Conversely, other federal and state agencies may identify issues of concern to the NRC. To ensure these items are addressed by the proper regulatory authority, the NRC has established agreements, called memoranda of understanding, with other federal and state agencies which outline how these issues should be addressed.

This activity will introduce you to the major interagency agreements that the NRC has entered into and familiarize you with the regional or office points-of-contact that have been established for other federal and state agencies. It will also familiarize you with the inspection procedure which implements the Occupational Safety and Health Administration (OSHA) memorandum of understanding (MOU).

COMPETENCY AREAS: INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. IMC 1007, “Interfacing Activities Between Regional Offices of NRC and OSHA”
2. Regional Guidance or Office Guidance (if applicable)
3. MOU Section of the CFR Manuals
4. IP 93001, “OSHA Interface Activities”
5. Volume 61 of the Federal Register (61 FR) Page 40249 “Memorandum of Understanding with Respect to the Gaseous Diffusion Plants,” Published 81196, Effective 7126196
6. MOU with DOE on Cooperation Regarding the Gaseous Diffusion Plants
7. NRC Internal Website

EVALUATION CRITERIA: At the completion of this activity, you should be able to:

1. Locate the active MOU used to coordinate between the NRC and other federal or state agencies.

2. 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.

3. Explain the actions required by an NRC inspector when he/she identifies an occupational health and safety issue at a fuel facility. Be able to state where the guidance for these actions is provided.

4. Identify who, in your Region or Office, is the point of contact for coordinating NRC activities with the following federal agencies:
   a. OSHA
   b. Department of Transportation (DOT)
   c. Federal Emergency Management Administration (FEMA)
   d. DOE
   e. State Agencies
   f. Federal Bureau of Investigation (FBI)

TASKS:

1. Identify where the current NRC MOUs are available in your Region or Office. Electronic versions can be found on the NRC Internal Website by accessing “Information Resources”, then “Enforcement Manual”.

2. Review the MOUs to develop a general understanding of the agreements between the NRC and the following federal agencies: OSHA, DOT, FEMA, DOE, and FBI with particular attention to the OSHA MOU. For Regional inspectors, review any MOUs between the NRC and the states in your regions. Determine the major services or resources available to be coordinated between the NRC and these agencies.

3. Review IMC 1007 and IP 93001 to develop a general understanding of how the MOU with OSHA is implemented during an inspection.

4. Identify the designated liaison for those agencies and state agencies in your Region or Office.

5. Meet with your supervisor, an experienced qualified inspector, or the above liaison representative, and discuss two fuel facility issues that involved interface with other federal agencies or state agencies. Discuss how the issues were addressed in the context of the applicable NRC MOU and office guidance.

6. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-13

Basic-Level Individual Study Guide

TOPIC: (SG-14) Interaction with the Public

PURPOSE: The purpose of this activity is to acquaint you with the expectations of NRC inspectors when dealing with members of the public. Responsiveness and openness are essential to the Agency fulfilling its goal of enhancing public confidence. As a qualified inspector, you will have many opportunities to interact with the public. This SG will help you understand NRC procedures, policies, and available resources related to interaction with the public.

COMPETENCY AREAS:
COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. NUREG/BR 0215, "Public Involvement in the Nuclear Regulatory Process" Rev. 1
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. NRC Internal Website, Communication and Public Meetings
7. Regional or Office guidance related to interaction with the public (Conduct of public meetings, Response to inquiries from the public, Release of Information to the Public).

NOTE: NUREG references in this activity that cannot be found on the NRC External Website may be requested from your Public Affairs Officer (PAO**).**

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 that involve inquiries from members 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 it is handled by the NRC.

5. Explain what a "green ticket" item is used for and how is it handled.

6. Describe how other public inquiries, including "non-allegations," are handled in your office.

7. Describe what an NRC employee should do if he/she is requested to speak (on an NRC-related topic) at a meeting such as the Lions Club or local chapter of the American Nuclear Society.

8. Identify what types of NRC meetings are generally open to the public. List some that are not usually open to the public.

9. Describe how members of the public can find out about NRC public meetings. Discuss the expectations on timeliness of meeting notices and summaries.

10. 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 on the NRC's Internal and External Websites. Review the information available on the external NRC website related to general topics of interest to the public such as the Public Involvement, School Programs, and the Technical Information Papers.

2. Visit the NRC's "Plain Language Action Plan" on the internal website, including some of the links to resource materials.

3. Visit the Communication and Public Meetings page on the NRC Internal Web site. Review the public meeting policy and checklist.

4. Locate and review the material specifically listed in the Reference section of this activity. The NMSS Project Manager's Handbook and NUREG/BR-0200, Public Petition Process may also be beneficial in understanding the processing of 2.206 petitions and "ticketed items."

5. Review the steps in the rulemaking process on the NRC's External Website under "Public Meetings & Involvement."

6. Identify, locate, and review your region's policy guidance on staff receipt and processing of inquiries from the general public. Meet with your PAO or supervisor and discuss the expectations of an inspector who receives an inquiry.

7. Meet with your supervisor and discuss what types of public interactions you are likely to encounter and to ensure that you understand what you are to do. Then, discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-14

Basic-Level Individual Study Guide

TOPIC: (SG-15) Contacts with the Media

PURPOSE: The purpose of this activity is to provide you with an understanding of the importance of communicating with the public and media in an accurate, clear, and non-complex manner and within the limitations of agency guidance for the release of information to the public. This supports one of the NRC's main objectives of increasing public confidence. This Study Guide will provide you information on the implementation of the guidance on contacts with the public and media.

COMPETENCY AREAS:
COMMUNICATION
SELF-MANAGEMENT

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NUREG/BR-0202, Rev. 3, "Guidelines for Interviews with the Media" (ML050270289)
2. MD 3.4, "Release of Information to the Public"
3. NUREG/BR-0224, Rev. 1, "Guidelines for Conducting Public Meetings" (ML061710199)
4. Regional or Office Instructions establishing the policy and process for receipt of inquiries from the public/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 achieving that goal.
2. Identify the importance of communicating with the media in a manner to build trust.
3. Discuss the importance of the following with regard to communication with the media: agency goals, onsite inspection staff, safety focus, risk informed, trustworthiness, limited knowledge on the subject.
4. Discuss the importance of planning ahead and preparing well for communication 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.

NOTE: NUREG references in this activity that cannot be found on the NRC External Website may be requested from your PAO.

TASKS:

1. Meet with the regional PAO or someone from Office of Public Affairs at Headquarters to discuss the guidelines for interviews with the news media.

2. Explore all aspects of the importance of appropriate, accurate, and clear communications with the public provided on the NRC's Web Site.

3. Review the agency guidance on how to communicate with the public and the media.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-15

Basic-Level Individual Study Guide

TOPIC: (SG-16) Institute of Nuclear Power Operations (INPO) and Nuclear Energy Institute (NEI)

PURPOSE: The purpose of this activity is to familiarize you with the appropriate protocols when reviewing documentation generated by INPO or NEI. It will also familiarize you with the proper conduct when INPO is at a facility.

COMPETENCY AREA: REGULATORY FRAMEWORK
SELF-MANAGEMENT

LEVEL OF EFFORT: 1 hour

REFERENCES:

1. NUREG/BR-0075, Rev. 4, "NRC Field Policy Manual" (Available on the NRC Internal Website under Information Resources or ML041170225)
2. IMC 0616, "Fuel Cycle Safety and Safeguards Inspection Reports"

EVALUATION CRITERIA: Upon completion of the tasks in this activity, you will be asked to demonstrate your general understanding of the appropriate protocols and conduct when reviewing INPO or NEI and when conducting an inspection when INPO is at a facility by discussing the following:

1. Specify when it is appropriate to refer to INPO documents in an NRC inspection report or other agency documentation.
2. Identify the circumstances under which are you allowed to perform an inspection of an NEI initiative.
3. Identify the accepted protocol for an NRC inspector attending an INPO meeting held with licensee personnel.

TASKS:

1. Review Field Policy Manual - Policy No. 9, "NRC Review of Institute of Nuclear Power Documents."
2. Review Field Policy Manual - Policy No. 14, "NRC Interaction with the Nuclear Energy Institute."
3. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-16

Basic-Level Individual Study Guide

TOPIC: (SG-17) Freedom of Information Act and the Privacy Act

PURPOSE: The purpose of this activity is to provide you with an understanding of the how the NRC implements the FOIA and the Privacy Act while guarding against the inadvertent and unauthorized release of information. While it is very important to communicate with the public, communication must be done within the limitations of agency guidance for the release of information to the public. This supports one of the NRC's main objectives of increasing public confidence. This SG will provide you information on the implementation of the guidance on responding to FOIA requests for information from the public.

COMPETENCY AREAS:
COMMUNICATION
SELF-MANAGEMENT
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 6 hours

REFERENCES:

1. 10 CFR Part 2.390, "Public inspections, exemptions, requests for withholding"
2. 10 CFR Part 9, "Public Records"
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
7. NRC Sensitive Unclassified Non-Safeguards Information (SUNSI) policy
http://www.internal.nrc.gov/OIS/divisions/irsd/SUNSI/index.html

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 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 a FOIA request:
   a. provide all records subject to the request in the Agency's possession;
   b. identify other NRC offices that might have records subject to the FOIA request;
   c. screen the records prior to release to ensure that non-public information is properly marked prior to forwarding to FOIA coordinator; and
   d. support the decision to withhold information by providing the appropriate exemption and "foreseeable harm" statements.

4. Identify the type of information which should be withheld from release when responding to an FOIA request, including proprietary, pre-decisional, and privacy information.

5. Describe the legal limitations of what can be released to the public and what must be protected under the Privacy Act.

6. Describe the policy and procedure for processing FOIA requests for agency records.

7. Discuss the process and criteria for evaluating a withholding request submitted under 10 CFR Part 2.390.

TASKS:

1. Meet with the FOIA Coordinator to discuss the procedure for processing FOIA requests for agency records.

2. Explore the information made available to the public on the NRC's Website and via the Agenceywide Document Access and Management System (ADAMS).

3. Review the agency guidance on how to implement the FOIA without releasing pre-decisional information and other information covered under the Privacy Act.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-17

Basic-Level Individual Study Guide

TOPIC: (SG-18) 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 forums for communicating issues with licensees. In addition to communicating effectively, as government officials, inspectors have additional requirements to follow during entrance and exit meetings to ensure proprietary data and safeguard information are not disclosed, and information is shared with the public when appropriate. To ensure issues are discussed in accordance with NRC requirements, communication standards have been established that outline how entrance and exit meetings are to be conducted. The purpose of this SG is to introduce you to 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 AREAS:
COMMUNICATION
TEAMWORK
INSPECTION

LEVEL OF EFFORT: 6 hours

REFERENCES:
1. IMC 2600. "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program"
2. Regional Guidance or Office Guidance (if applicable)

EVALUATION CRITERIA:
At the completion of this activity, you should be able to:

1. Locate the various guidance for conducting NRC entrance and exit meetings.
2. Successfully conduct an entrance and exit meeting in accordance with NRC guidance.

TASKS:
1. Locate and read the guidance for conducting NRC entrance and exit meetings contained in IMC 2600 and regional or office instructions.
2. Observe at least one entrance and exit meeting conducted at a fuel facility. If possible, observe meetings that have been conducted for a wide range of inspection activities in a variety of forums, such as a public exit meeting.

3. Review an inspection report that was recently completed, and conduct a “mock” entrance and exit meeting of the inspection report findings in the presence of your supervisor or a fully qualified inspector designated by your supervisor.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-18

Basic-Level Individual Study Guide

TOPIC: (SG-19) 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 fuel facility. 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, which outline what information should be documented in an inspection report, and how that information should be presented. The purpose of this SG is to introduce you to the standards for preparing NRC inspection reports and to allow you to demonstrate an understanding of the applicable inspection report documentation requirements.

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

LEVEL OF EFFORT: 16 hours

REFERENCES:

1. IMC 0616, “Fuel Cycle Safety and Safeguards Inspection Reports”
2. IMC 0620, “Inspection Documents and Records”
3. Regional Guidance or Office Guidance (as applicable)
4. Office of the Executive Director of Operations Administrative Quality Control Checklist

EVALUATION CRITERIA:

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

1. Locate the guidance for preparing NRC inspection reports.
2. Verify 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.

TASKS:

1. Locate and read the various guidance for documenting inspection findings. The necessary information will be contained in NRC IMCs, and regional or office instructions.

2. Select a recently completed inspection report that was prepared in your region or office that contains both NRC and licensee identified findings. Compare the inspection report format and content to the report preparation guidance contained in IMC 0616, and to any applicable regional or office guidance. Through review of the guidance, and conversations with the report author, verify the report was prepared in accordance with the requisite report preparation guidance.

3. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-19

Basic-Level Individual Study Guide

TOPIC: (SG-20) Differing Professional Opinions (DPO)

PURPOSE: The purpose of this activity is to provide guidance on the informal and formal processes for pursuing resolution of differing professional opinions. It is the policy of the NRC and the responsibility of all NRC supervisory and managerial personnel to maintain a working environment that encourages each employee to make known his/her best professional judgment even though that judgment may differ from the prevailing staff view, disagree with a management decision or policy position, or take issue with proposed or established agency practices. To further this policy, NRC MD 10.159, "The NRC Differing Professional Opinions Program" establishes a formal process for the staff to use when expressing differing professional opinions. This SG will provide you with an understanding of NRC's DPO process.

COMPETENCY AREAS:
INSPECTION
SELF-MANAGEMENT
COMMUNICATION

LEVEL OF EFFORT: 2 hours

REFERENCES:
1. MD 10.159, "The NRC Differing Professional Opinions Program"
2. Regional Guidance or Office Guidance (if applicable)

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

1. Define what a DPO is and discuss the precondition that should be met prior to submittal.
2. State the expectations of NRC employees regarding making known their best professional judgment even though it may differ from the judgment of others.
3. Discuss under what circumstances the various methods available for expressing your best professional judgment would be used, including DPO.
4. State the purpose of the NRC's DPO process.

5. Describe the Agency's DPO process and how it is implemented.

6. Describe where the resolution of the resolution of a DPO is published.

TASKS:

1. Meet with the regional counsel, or other individual designated to be your resource for this activity, to develop an understanding of the NRC policy and guidance for resolution of differing professional opinions.

2. Review the Agency's MD 10.159, "The NRC Differing Professional Opinions Program."

3. Explore all aspects of the Agency's DPO guidance and documentation provided on the NRC's internal website.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-20

Basic-level Individual Study Guide

TOPIC: (SG-21) Integrated Safety Analysis (ISA) Overview (not for MC&A[1] inspectors)

PURPOSE: The NRC, in 10 CFR Part 70, Subpart H, requires licensees to evaluate the risks associated with their facilities and to implement measures to ensure that the risks are limited. The NRC has defined high and intermediate consequence events in 10 CFR Part 70.61, "Performance Requirements," and requires the licensees to implement Items Relied on For Safety (IROFS) to ensure the risk of the event is highly unlikely or unlikely, respectively. Changes to the facility must be evaluated to ensure no additional risks are created. Safety events are required to be reported to the NRC.

COMPETENCY AREAS:
INSPECTION
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. 10 CFR Part 70, Subpart H, "Additional Requirements for Certain Licensees Authorized to Possess a Critical Mass of Special Nuclear Material"
2. The License Application and Integrated Safety Analysis (ISA) for the facility designated by your supervisor
3. (Optional) Procedures used by the licensee at your designated facility to implement the ISA methodology
4. Chapter 3 of NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" (ML020930033)

EVALUATION CRITERIA: At the completion of the guide, you should be able to do the following:

1. Explain the performance requirements of 10 CFR 70.61.
2. Explain how the IROFS and Management Measures contribute to risk reduction and accident mitigation, and how they factor into the ISA.

1 Material Control and Accounting

3. Explain the process used, in the ISA designated by your supervisor, to establish accident scenarios, likelihoods, consequences, and determine IROFS.

4. Explain the process for facility changes as described in 10 CFR Part 70.72.

5. Explain the NRC reporting requirements listed in 10 CFR Part 70, Appendix A.

TASKS:

1. Read 10 CFR Part 70, Subpart H, parts 61 through 74.

2. Read the following sections from the License Application for your assigned facility:
   a. "Integrated Safety Analysis" (typically Section 3)
   b. "Management Measures" (typically Section 11)

3. Read the introductory chapter of the ISA for your assigned facility and a chapter on a selected process or area.

4. (Optional) If available, obtain and read the implementing procedure used by the licensee at your assigned facility for the ISA methodology (evaluating hazards, identifying IROFS, and implementing facility changes).

5. Discuss with your supervisor, or a qualified Fuel Facility Operations inspector, the ISA Methodology used by your assigned facility licensee. Include in the discussion the following topics:
   a. Performance Requirements
   b. IROFS
   c. Management Measures
   d. Facility Change Process
   e. Reporting Requirements.

DOCUMENTATION: Basic-Level Qualification Signature Card Item SG-21

Basic-Level Individual Study Guide

TOPIC: (SG-22) Overview of 10 CFR Part 30

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the rules governing domestic licensing of byproduct material. This SG will help you to understand the content of Part 30 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 30, latest revision, "Rules of General Applicability to Domestic Licensing of Byproduct Material"

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 30 by successfully discussing the following:

1. State the purpose of Part 30.
2. Given a specific subject, identify which section in Part 30 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Website.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-22

Basic-Level Individual Study Guide

TOPIC: (SG-23) Overview of 10 CFR Part 40

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the Domestic Licensing of Source Material. This SG will help you to understand the content of Part 40 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 40, latest revision, "Domestic Licensing of Source Material"

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 40 by successfully discussing the following:

1. State the purpose of Part 40.
2. Given a specific subject, identify which section in Part 40 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Website.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-23

Basic-Level Individual Study Guide

TOPIC: (SG-24) Overview of 10 CFR Part 70

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of Domestic Licensing of Special Nuclear Material. This SG will help you to understand the content of Part 70 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 70, latest revision, "Domestic Licensing of Special Nuclear Material"

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 70 by successfully discussing the following:

1. State the purpose of Part 70.
2. Given a specific subject, identify which section in Part 70 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Website.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-24

Basic-Level Individual Study Guide

TOPIC: (SG-25) Overview of 10 CFR Part 71

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of Packaging and Transportation of Radioactive Material. This SG will help you to understand the content of Part 71 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 71, latest revision, "Packaging and Transportation of Radioactive Material"

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 by successfully discussing the following:

1. State the purpose of Part 71.
2. Given a specific subject, identify which section in Part 71 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Website.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-25

Basic-Level Individual Study Guide

TOPIC: (SG-26) Overview of 10 CFR Part 73

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the Physical Protection of Plants and Materials. This SG will help you to understand the content of Part 73 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Home Page
2. 10 CFR Part 73, latest revision, "Physical Protection of Plants and Materials"

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 73 by successfully discussing the following:

1. State the purpose of Part 73.
2. Given a specific subject, identify which section in Part 73 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Website.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-26

Basic-Level Individual Study Guide

TOPIC: (SG-27) Overview of 10 CFR Part 74

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of Material Control and Accounting of Special Nuclear Material. This SG will help you to understand the content of Part 74 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 74, latest revision, "Material Control and Accounting of Special Nuclear Material"

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 74 by successfully discussing the following:

1. State the purpose of Part 74.
2. Given a specific subject, identify which section in Part 74 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Web Site.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-27

Basic-Level Individual Study Guide

TOPIC: (SG-28) Overview of 10 CFR Part 76

PURPOSE: The purpose of this activity is to acquaint you with the regulations that specify the requirements for all aspects of the Certification of Gaseous Diffusion Plants. This SG will help you to understand the content of Part 76 and how to locate the specific requirements for any subject.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 76, latest revision, "Certification of Gaseous Diffusion Plants"

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 76 by successfully discussing the following:

1. State the purpose of Part 76.
2. Given a specific subject, identify which section in Part 76 discusses the requirements for that subject by using the search feature on the NRC Regulations & 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 & Nuclear Regulatory Legislation web pages presented on the NRC's Internal Web Site.
2. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-28

Basic-Level Individual Study Guide

TOPIC: (SG-29) Overview of 10 CFR Parts 19 and 20

PURPOSE: The purpose of this activity is to familiarize you with Parts 19 and 20 of the NRC regulations. These regulations are generic to any position within the Agency and will provide a perspective on conducting inspections in the working environment of a fuel facility. This SG will help you understand the purpose of Parts 19 and 20 and provide you with some basic knowledge that all NRC inspectors will use when conducting inspections in radiologically-controlled areas.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 4 hours

REFERENCES:

1. NRC Internal Website
2. 10 CFR Part 19, "Notices, Instructions, and Reports to Workers: Inspection and Investigations"
3. 10 CFR Part 20, "Standards for Protection Against Radiation"

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

1. Describe the general purpose of Part 19.
2. Identify the section of 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 Part 19 that requires a licensee to report doses to workers.
4. Describe the purpose of Part 20.
5. Identify the section 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 Part 19 and 20.

TASKS:

1. Review Part 19 for a general understanding of the following:
   a. The purpose of Part 19 (19.1)
   b. Documents are required to be posted (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. What 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 Part 20 for a general understanding of the following:
   a. The purpose of 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 ALARA (20.1101)
   e. Conditions requiring individual monitoring of external and internal occupational dose (20.1502)

3. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-29

Basic-level Individual Study Guide

TOPIC: (SG-30) Licensee-Specific Regulatory Documents and Procedures (not for MC&A inspectors)

PURPOSE: The purpose of this activity is to acquaint you with licensee-specific documents and procedures that you need to be aware of and be able to access while onsite during an inspection. These documents and procedures describe how a licensee complies with NRC regulations and requirements. As a fully qualified inspector, you will need to identify circumstances where the licensee is in non-compliance. Also, inspectors must adhere to applicable licensee procedures at all times while onsite. This SG will acquaint you with the most common types of licensee-specific regulatory documents and procedures and will help you learn how individual facilities may implement NRC regulations and requirements differently.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 16 hours

REFERENCES:

1. Technical Specifications for a gaseous diffusion plant and a license application for one fuel facility
2. NUREG-1520. "Standard Review Plan for Review of a License Application for a License Application of a Fuel Cycle Facility" (ML020930033)
3. Facility-specific license
4. Facility-specific Safety Evaluation Report

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your familiarity with the role of licensee-specific regulatory documents and procedures within the regulatory framework by successfully addressing the following:

1. Identify the regulatory enforcement hierarchy that exists between CFR requirements, a facility-specific license, facility-specific license application, and Safety Evaluation Report (SER), and facility-specific procedures.
2. Recognize how the NRC Standard Review Plan is related to the documents identified in item 1.

3. Identify which NRC organization writes safety analyses, which organization approves them, and which organization is required to maintain current copies.

4. Identify the NRC organization responsible for writing Regulatory Guides and Safety Evaluation Reports, and the organization responsible for approving them. Describe the requirements for maintaining copies current.

5. Discuss how enforcement actions relate to safety analysis reports or an SER.

6. Locate where the following can generally be found:
   a. Safety Limits (facility-specific)
   b. Design Basis Accident Analysis
   c. Licensee commitments to various standards
   d. Specific, but not necessarily all, approved methods for complying with NRC requirements
   e. Licensee Security Plan

TASKS:

1. Locate all applicable reference documents.

2. Meet with an appropriately qualified inspector and discuss the general objectives of a licensee security plan and the restrictions on its public availability. Also, determine the specific security requirements to which an NRC inspector must personally adhere.

3. Discuss with your Office Enforcement Specialist your answers to the above questions related to enforcement policy.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-30

Basic-Level Individual Study Guide

TOPIC: (SG-31) Planning Fuel Facility Inspections

PURPOSE: This guide will familiarize you with a working knowledge of how to plan for fuel facility inspections and assist in identifying guidance documents for review (for fuel facility inspectors conducting routine inspections of fuel fabrication facilities, gaseous diffusion facilities, and uranium conversion and enrichment facilities).

COMPETENCY AREAS:
INSPECTION
INSPECTION PLANNING

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. 10 CFR Part 40, “Domestic Licensing of Source Material” (particularly Part 40.64)
2. 10 CFR Part 70, “Domestic Licensing of Special Nuclear Material” (particularly Part 70.66)
3. 10 CFR Part 76, “Certification of Gaseous Diffusion Plants” (particularly Part 76.121)
4. 10 CFR Part 19, “Notices, Instructions, and Reports to Workers: Inspection and Investigations”
5. 10 CFR Part 20, “Standards for Protection against Radiation”
6. 10 CFR Part 71, “Packaging and Transportation of Radioactive Material”
7. 10 CFR Part 73, “Physical Protection of Plants and Materials”
8. 10 CFR Part 74, “Material Control and Accounting of Special Nuclear Material”
9. 29 CFR Part 1910, “Occupational Safety and Health Standards”
10. 49 CFR Parts 170-189, “Transportation”
11. The License Application, Plant Technical Specification (PST) or ISA for the facility designated by your supervisor.
12. Applicable IPs

13. Applicable classified and sensitive unclassified non-safeguards information (SUNSI) information

14. Procedures used by the licensee at your designated facility to implement the ISA methodology.

15. NUREG-1513, “Integrated Safety Analysis Guidance Document.” (ML011440260)

16. NUREG-1520, “Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility.” (ML020930033)

17. Previous Licensee Performance Review

18. Previous applicable inspection reports from areas lasted inspected

19. Materials Operational Experience Gateway (www.internal.nrc.gov/FSME/OpE/index..html)

20. Regional Office Instruction 2211, “Inspection Planning for Reactors and Fuel Facilities.” (ML051440266)

EVALUATION CRITERIA:

At the completion of the study guide, you should be able to do the following:

1. Identify the appropriate inspection procedures needed for the inspection.

2. Identify the applicable regulations and guidance documents for inspection.

3. Determine the focus of the inspection based on risk, regulations, and license requirements.

4. Determine the relationship between the purpose and objectives in the inspection procedures to the licensing basis documents.

TASKS:

1. Review the applicable regulations for the facility.

2. Review the license application, PST, ISA and/or FNMCP for your assigned facility.

3. Review the introductory chapter of the ISA for your assigned facility and a chapter on a selected process or area that will be inspected. (i.e. evaluating hazards, identifying IROFS, and implementing facility changes).

4. Review the applicable last two inspection reports.

5. Review the previous Licensee Performance Review of the facility.

6. (Optional) If available, obtain and read the implementing procedure for the area of inspection used by the licensee at your assigned facility.

7. Discuss with your supervisor, or a qualified Fuel Facility inspector, any questions concerning the license application, previous inspections, events, Information Notices, and ISA methodology.

8. Familiarize yourself with the Master Inspection Plan (MIP) and schedule.

9. Familiarize yourself with the Inspection Plan form

10. Learn how to use Reactor Program System or other in-house custom software.

11. Create a Plant Issues Matrix (PIMS), Open items List, and NMED report.

12. Develop a mock inspection plan and review with your supervisor or a qualified Fuel Facility Operations inspector.

13. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Qualification Signature Card Item SG-31

Basic-Level Individual Study Guide

TOPIC: (SG-32) Information Security

PURPOSE: The purpose of this activity is to familiarize you with the different types and levels of classified information. This SG will help you to understand the fundamental rules and responsibilities to properly identify, mark, handle, store, transmit, reproduce, and destroy classified and Safeguards Information. This activity will also provide the inspector with knowledge of the NRC policy for handling, marking, and protecting SUNSI.

COMPETENCY AREA: REGULATORY FRAMEWORK

LEVEL OF EFFORT: 16 hours

REFERENCES:

1. NRC Internal Web Page
2. MD 12.2, "NRC Classified Information Security Program"
3. MD 12.6, "NRC Sensitive Unclassified Information Security Program"
4. 10 CFR Part 73, "Physical Protection of Plants and Materials"
5. NRC Sensitive Unclassified Non-Safeguards Information (SUNSI) policy http://www.internal.nrc.gov/OIS/divisions/irsd/SUNSI/index.html

EVALUATION CRITERIA: Upon completion of this activity, and as determined by the supervisor the inspector should be able to:

1. Describe the different types and levels of classified information.
2. Explain the need for maintaining classification of certain material safeguards and the proper handling of the material.
3. Describe the NRC policy for handling, marking, and protecting SUNSI.
4. Describe handling of classified and sensitive unclassified information originating outside of NRC.

TASKS:

1. Complete the Information Security (INFOSEC) Awareness Training. To access the training: (1) select Training on the NRC's internal

Web site, (2) Select “what’s new” under “Training Basics”, (3) select “all online courses”, (4) then select “online” under “information Security” and “INFOSEC Awareness.” URL: http://grape.nrc.gov/Training/NewSite/courselogin.cfm?page=infosec . Be sure to print the completion record at the end of the online course. You must present this to your supervisor as evidence that you have completed the course.

2. Review the SUNSI policy on the NRC internal web page.

3. Review the reference material to gain an understanding of the principles discussed in the evaluation criteria.

4. Review and discuss the evaluation criteria with your supervisor or fully qualified inspector.

DOCUMENTATION: Basic-Level Certification Signature Card Item SG-32

Basic-Level

On-the-Job Training Activities

Basic-Level On-the-Job Training Activities

The on-the-job (OJT) activities require you to conduct inspection-related work, under supervision, at a fuel facility. They are designed to allow you to observe and perform key inspection tasks under controlled circumstances. Like the individual study guides, each of the on-the-job activities informs you why the activity is important, how much time you might need to complete the assignment, and what you are expected to complete successfully during the activity.

Prior to beginning the activities in this section, you must successfully complete the course work for site access. There are two ways this can be done. You can complete the NRC's Site Access Course and the site specific requirements for access. Or, you may complete the site access requirements at a site. Your supervisor will discuss with you the best way for you to meet the site access requirements.

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

1. The activities in this section should be completed in the order in which they are presented.

2. Complete all parts of each activity.

3. 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 applied. Your supervisor may also designate other fully qualified inspectors to work with you as you complete the various activities.

4. You are responsible for keeping track of what tasks you have completed. Be sure that you have completed all aspects of an OJT activity before you meet with your supervisor for evaluation.

Basic-Level On-the-Job Training Activity

TOPIC: (OJT-1) Facility Familiarization Tour with a Qualified Inspector

PURPOSE: The purpose of this activity is to: (1) acquaint you with the general layout of a facility and identify various major pieces of equipment; (2) instruct you in the types of industrial and radiological personal protection requirements and the proper method of complying with these requirements; (3) instruct you in the use of security procedures; and (4) instruct you in the proper response to an emergency if the emergency is declared while in the facility.

In addition, this activity will familiarize you with the appropriate protocol for the conduct of an inspector in the plant and the inspector's role in gathering facility status information. If there is a control room, this activity will also help you to become familiar with general control room layout, required control room staffing, and the inspector's role in gathering facility status information.

COMPETENCY AREAS:
INSPECTION
COMMUNICATION
SELF-MANAGEMENT
FUNDAMENTAL PLANT DESIGN AND OPERATION
EMERGENCY RESPONSE

Note: Completion of this activity may require several facility tours.

LEVEL OF EFFORT: 40 hours

REFERENCES:
1. Licensee's drawing(s) of the site building layouts.
2. Licensee-specific procedure for the conduct of operations in the control room.

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the general plant layout and inspector behavior in the plant by successfully addressing the following:

1. Given a drawing of the site building layout, be able to identify where the major facility areas are located.
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. Explain how you would know what type(s) of radiological protection equipment are required before entering a radiologically controlled area (RCA).

4. Given specific scenarios related to security situations, describe what actions you would take.

5. Given specific scenarios related to emergency response situations, describe what actions you would take.

6. Given specific scenarios related to health physics situations, describe what actions you would take.

7. Explain the appropriate protocol for an inspector's conduct in the plant and control room (if applicable).

8. Explain how you would respond if you were present in the plant or control room during an emergency situation. Specifically, you should explain why it is never appropriate for an inspector to operate any controls, or to interfere in licensee operations, during routine or emergency situations.

9. Describe the general layout of a control room (if applicable). Explain where operator(s) must be stationed in the control room during operations. Describe examples of site specific restrictions for limits on where an inspector can go in the plant or a control room, with or without permission.

10. Describe the basic staffing in the plant and control room (if applicable) and where you would expect to find various operators.

11. Describe the types of information an inspector gathers in the plant and control room and how that information is obtained.

TASKS:

1. Review a drawing(s) of the building layout for the site and plan a route for a tour that will include the major areas on the site, such as:
   a. main production area
   b. central alarm systems and secondary alarm systems (CAS & SAS) if applicable
   c. RCA
   d. emergency response facility
   e. control room(s)
   f. liquid waste treatment facilities
   g. airborne effluent treatment facilities
   h. criticality warning system
   i. other areas deemed appropriate by a qualified inspector or resident inspector, if applicable

2. Prior to the tour, discuss the requirements for personal industrial safety equipment with a qualified inspector or resident inspector, if applicable.

3. Tour the facility with a qualified inspector or resident inspector, if applicable, and locate the major pieces of equipment and facility areas, including but not limited to those items described above.

4. Enter the RCA with a qualified inspector or resident inspector, if applicable, and tour the area to observe and/or discuss items such as: different radiological control postings, methods of designating areas that have additional radiological control requirements for entry, different radiological control clothing requirements for different areas, use of portal monitors and personal friskers, and personal monitoring dosimetry.

5. During the plant tour, discuss the proper security procedures for entering the areas discussed above, including the actions to take in the event a procedure error or violation of security rules is committed or observed.

6. During the plant tour, discuss the proper response in the event an emergency is declared while in the facility.

7. During the plant tour, discuss the proper response in the event of a radiological control event or anomaly.

DOCUMENTATION: Basic-level Certification Signature Card – OJT-1

Basic-Level On-the-Job Training Activity

TOPIC: (OJT-2) Licensee Performance Reviews (LPRs)

PURPOSE: The purpose of this activity is to: (1) acquaint you with the various types of information discussed in the meetings that develop LPRs; (2) instruct you in the types of information provided in the LPR that are important to an inspector; and (3) inform you of the appropriate inspector protocols so that you will know when NRC participation is and is not appropriate.

COMPETENCY AREAS: INSPECTION
COMMUNICATION
SELF-MANAGEMENT

LEVEL OF EFFORT: 2 hours

REFERENCES: None

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the NRC inspector's role in the LPR development meeting, by successfully discussing the following:

1. Identify the types of information discussed in the LPR development meeting that are important to an inspector and discuss why the information is important.

2. Given specific examples, be able to discuss if it is appropriate for an inspector to participate in the discussion at or about the LPR development meeting.

TASKS:

1. Discuss with a qualified inspector the types of information provided at the meeting or in a LPR meeting document that would be important to you and why that information is important.

2. Discuss with a qualified inspector the protocols of when an NRC inspector should and should not participate in the LPR development meeting.

3. Review the licensee's overview organization chart and then either observe a LPR meeting with a licensee with a qualified inspector, or review an LPR meeting document with a qualified inspector.

4. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Certification Signature Card Item OJT-2

Basic-Level On-the-Job Training Activity

TOPIC: (OJT-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 baseline inspection program as defined in the applicable IMC.

COMPETENCY AREAS:
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 individual proficiency. There is no set number of inspections you must complete. You must participate in inspections until such time as you can address the evaluation criteria to the satisfaction of your supervisor.

REFERENCES:

1. IMC 0330, "Guidance for NRC Review of Licensee Draft Documents"
2. IMC 2600, "Fuel Cycle Facility Operational Safety and Safeguards Inspection Program," or equivalent, for planned inspection
3. Inspection procedure(s) for planned inspection(s)
4. License application or safety analysis report for activity to be inspected
5. Regional Guidance or Office Guidance (if applicable)

EVALUATION CRITERIA: Upon completion of this activity, you will be asked to demonstrate your understanding of the baseline inspection process by:

1. Describing the contents and purpose of the site-specific inspection plan.
2. Describing the purpose of the inspection planning call.

3. Providing your supervisor or the person designated as a resource with a specific inspection plan that you have prepared. Describe the purpose and contents of a specific inspection plan.

4. Discussing the documents to be reviewed including their content and purpose prior to an inspection.

5. Describing the contents and purpose of the part of the entrance meeting you conducted.

6. Describing the activities you accomplished during the inspection(s) and their purpose.

7. Describing the purpose of the management brief and the exit pre-brief of licensee management in which you participated.

8. Describing the contents and purpose of the part of the exit meeting you conducted.

TASKS:

1. Review the annual or applicable site specific inspection plan to understand where your inspection effort fits into the overall plan.

2. Participate in an inspection planning call to the licensee.

3. Participate in developing the inspection specific plan.

4. Review the following documents to understand how they provide background information, current issues, areas for emphasis, and support for the inspection effort you plan to accomplish:
   a. Previous inspection reports.
   b. PIM
   c. Appropriate licensee documents
   d. Applicable IPs
   e. Other applicable documents, i.e., Performance Indicators, Licensee Event Reports, Information Notices, Bulletins, etc.

5. Observe an entrance meeting.

6. Observe the activities performed by a qualified inspector during the completion of the planned inspection by:
   a. Observing implementation of inspection procedures
   b. Observing interviews / discussion with facility personnel
   c. Observing facility work activities
   d. Reviewing documentation and records
   e. Discussing inspection results with the lead inspector

7. Observe briefing of NRC management.

8. Observe an exit pre-brief of licensee management.

9. Observe an exit meeting.

10. Participate as an active member in an inspection by:
    a. Drafting a portion of the inspection specific plan.
    b. Conducting activities described in item 6 above, as appropriate.
    c. As deemed appropriate by your supervisor, conducting a portion of:
        (1) the entrance meeting
        (2) the briefing of NRC management
        (3) the pre-brief of licensee management
        (4) the exit meeting

11. Meet with your supervisor or the person designated to be your resource for this activity and discuss the items listed in the Evaluation Criteria section.

DOCUMENTATION: Basic-Level Qualification Signature Card Item OJT-3

Basic-Level On-the-Job Training Activity

TOPIC: (OJT-4) 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 licensees, 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 longer-term, broad assessments of licensee performance.

COMPETENCY AREAS:
FUNDAMENTAL PLANT DESIGN AND OPERATION
INSPECTION
COMMUNICATION
TEAMWORK
ASSESSMENT AND ENFORCEMENT

LEVEL OF EFFORT: 40 hours

REFERENCES:

1. IMC 0330, “Guidance for NRC Review of Licensee Draft Documents”
2. IMC 0616, “Fuel Cycle Safety and Safeguards Inspection Reports”
3. IMC 0620, “Inspection Documents and Records”
4. Regional Guidance or Office Guidance (if applicable)
5. Enforcement Policy (Refer to the NRC internal website)

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 what findings should be documented in an inspection report.
2. Describe how to process a finding using the NRC Enforcement Policy.
3. Discuss how to write an inspection report input.

4. Discuss how to write a violation.

5. Contrast the differences in documenting Inspector-Identified Findings and Licensee-Identified Violations.

TASKS:

1. Using IMC 0616, determine if an identified issue is above the threshold for documentation.

2. Using IMC 0616 and other available guidance, draft an inspection report input.

3. Given a violation of regulatory requirements and the Enforcement Policy and guidance, draft a violation.

4. Using IMC 0330, IMC 0616 and IMC 0620, describe how to determine the documents that must be included as attachments to an inspection report as an agency record.

DOCUMENTATION: Basic-Level Certification Signature Card Item OJT-4

Basic-Level Signature Cards and Certification

Inspector Name: _____	*Employee Initials/ Date*	*Supervisor's Signature/Date*
A. Training Courses		
H-100, Site Access Training (or licensee site access)		
F-201 or F-201S, Fuel Cycle Processes		
G-104, Expectations for Inspectors		
Ethics		
Allegations		
MCA-101DC, Intro to Nuclear Materials Control an Accountability[1]		
MCA-104DB, Introduction to Measurement Programs[1]		
MCA-110, Basics of Nuclear Materials Accountability[1]		
MCA- 120, Basics of Nuclear Materials Control[1]		
F-101S, Nuclear Criticality Safety[3]		
OSHA HAZWOPER or iLearn Health & Safety Training Suite[2]		
B. Individual Study Activities		
SG-1 History and Organization of the Nuclear Regulatory Commission		
SG-2 Inspector Objectivity, Protocol, and Professional Conduct[2]		
SG-3 Fitness for Duty (FFD) Rule		
SG-4 Allegations[2]		
SG-5 NRC's Response to an Emergency at a Nuclear Facility		
SG-6 The Enforcement Process and the Backfit Process		
SG-7 The Office of Investigations		
SG-8 Exploring the Fuel Facility Inspection Program		
SG-9 Exploring the Nuclear Materials Events Database (NMED)		

SG-10 Incident Inspection Team (IIT) Activities, Augmented Inspection Team (AIT), and Special Inspection Team (SIT)		
SG-11 Understanding How the Commission Operates		
SG-12 Organization and Content of the NRC Inspection Manual		
SG-13 NRC Interagency Agreements		
SG-14 Interaction with the Public		
SG-15 Contacts with the Media		
SG-16 Institute of Nuclear Power Operations (INPO) and Nuclear Energy Institute (NEI)		
SG-17 Freedom of Information Act and the Privacy Act		
SG-18 Entrance and Exit Meetings		
SG-19 Documenting Inspection Findings		
SG-20 Differing Professional Opinions (DPO)		
SG-21 Integrated Safety Analysis Overview (not MC&A)		
SG-22 Overview of 10 CFR Part 30		
SG-23 Overview of 10 CFR Part 40		
SG-24 Overview of 10 CFR Part 70		
SG-25 Overview of 10 CFR Part 71		
SG-26 Overview of 10 CFR Part 73		
SG-27 Overview of 10 CFR Part 74		
SG-28 Overview of 10 CFR Part 76		
SG-29 Overview of 10 CFR Parts 19 and 20		
SG-30 Licensee-Specific Regulatory Documents and Procedures (not MC&A)		
SG-31 Planning Fuel Facility Inspections		
SG-32 Information Security		

C. On-the-Job Training Activities		
OJT-1 Facility Familiarization Tour with a Qualified Inspector or Resident Inspector		
OJT-2 Licensee Performance Reviews (LPRs)		
OJT-3 Inspection Activities		
OJT-4 Documenting Inspection Findings		

[1] Required for MC&A inspectors only
[2] Required prior to a site visit or inspection accompaniment.
[3] Required for NCS inspectors only

Basic Inspector Certification

_____

(Name)

Has successfully completed all of the requirements
to be certified as a

BASIC INSPECTOR

Supervisor Signature_____ Date:_____

This signature card and certification must be accompanied by the appropriate Form 1, Basic Level Equivalency Justification, if applicable.

Form 1: Basic-Level Equivalency Justification	
Inspector Name: _____	***Identify equivalent training and experience for which the inspector is to be given credit***
A. Training Courses	
F-201 or F-201S Fuel Cycle Processes	
MCA-101DC, Intro to Nuclear Materials Control an Accountability[1]	
MCA-104DB, Introduction to Measurement Programs[1]	
MCA-110, Basics of Nuclear Materials Accountability[1]	
MCA- 120, Basics of Nuclear Materials Control[1]	
Nuclear Criticality Safety Self-Study Course [2]	
OSHA HAZWOPER or iLearn Health & Safety Training Suite[3]	
B. Individual Study Activities	
SG-1 History and Organization of the Nuclear Regulatory Commission	
SG-2 Inspector Objectivity, Protocol, and Professional Conduct	
SG-3 Fitness for Duty (FFD) Rule	
SG-4 Allegations	
SG-5 NRC's Response to an Emergency at a Nuclear Facility	
SG-6 The Enforcement Process and the Backfit Process	
SG-7 The Office of Investigations	
SG-8 Exploring the Fuel Facility Inspection Program	
SG-9 Exploring the Nuclear Materials Events Database (NMED)	
SG-10 Incident Inspection Team (IIT) Activities, Augmented Inspection Team (AIT), and Special Inspection Team (SIT)	
SG-11 Understanding How the Commission Operates	
SG-12 Organization and Content of the NRC Inspection Manual	
SG-13 NRC Interagency Agreements	
SG-14 Interaction with the Public	

Form 1: Basic-Level Equivalency Justification	
Inspector Name: _____	***Identify equivalent training and experience for which the inspector is to be given credit***
SG-15 Contacts with the Media	
SG-16 Institute of Nuclear Power Operations (INPO) and Nuclear Energy Institute (NEI)	
SG-17 Freedom of Information Act and the Privacy Act	
SG-18 Entrance and Exit Meetings	
SG-19 Documenting Inspection Findings	
SG-20 Differing Professional Opinions (DPO)	
SG-21 Integrated Safety Analysis Overview	
SG-22 Overview of 10 CFR Part 30	
SG-23 Overview of 10 CFR Part 40	
SG-24 Overview of 10 CFR Part 70	
SG-25 Overview of 10 CFR Part 71	
SG-26 Overview of 10 CFR Part 73	
SG-27 Overview of 10 CFR Part 74	
SG-28 Overview of 10 CFR Part 76	
SG-29 Overview of 10 CFR Parts 19 and 20	
SG-30 Licensee-specific regulatory documents and procedures	
SG-31 Planning Fuel Facility Inspections	
SG-32 Information Security	
C. On-the-Job Training Activities	
OJT-1 Facility Familiarization Tour with a Qualified Inspector or Resident Inspector	
OJT-2 Licensee Performance Reviews (LPRs)	
OJT-3 Inspection Activities	
OJT-4 Documenting Inspection Findings	

[1] Required for MC&A inspectors only
[2] Required for NCS inspectors only
[3] The 24hr OSHA HAZWOPER training requirement is intended for qualifying individuals who do not have adequate prior experience or training. Qualifying individuals with adequate experience must use the equivalency examination or equivalent experience justification process to alternatively opt for the iLearn Health & Safety training suite.

Supervisor's Recommendation Signature / Date_____

Division Director's Approval Signature / Date_____

Copies to:
Inspector
HR Office

Attachment 1

Revision History for IMC 1247 Appendix A

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment and Feedback Resolution Accession Number
N/A	02/18/09 CN 09-006	Researched commitments for 4 years and found none. New inspection manual chapter to specify qualification requirements for NRC fuel facility operations, health physics, emergency preparedness, security, material control and accounting, and construction inspectors.	N/A	ML090400374
	ML12257A122 06/27/14 CN 14-014	This Appendix has been revised to reflect the Nuclear Criticality trainings requirements, to update study guides and On the Job training activities, and to incorporate OSHA HAZWOPER or iLearn Health & Safety Training Suite for required training.	N/A	ML14084A477