

March 5, 2010

SUMMARY OF COMMENTS ON SA-103, “ REVIEWING THE COMMON INDICATOR, TECHNICAL STAFFING AND TRAINING ”

I. Sent to the Agreement States for Comment: August 28, 2009 (FSME-09-075)

No comments.

II. Sent to the NRC Offices for Comment: August 28, 2009

Comments/Dated: Region III-10/02/09
DILR/FSME-09/24/09 (e-mail)
MSSA/FSME-02/24/10

Region III:

Comment:

The procedure indicates that program staffing and training should be reviewed in detail, however, it does not explicitly address hiring freezes and travel restrictions which are very common in the current economy. We suggest that the guidance include a question (or questions) covering these areas.

Response:

We agree with the comment. A question and answer will be added to Appendix B addressing this issue.

Office of Federal and State Materials and Environmental Programs (FSME)/ Division of Intergovernmental Liaison and Rulemaking (DILR):

Comment 1:

The Division made a number of editorial comments.

Response:

We agree with most of the comments. The procedure will be revised accordingly.

Division of Materials Safety and State Agreements (MSSA):

Comment 1:

The Division recommends that an additional question on “train-the-trainer” as provided below be added to the FAQs.

Q10: If a State uses a “train-the-trainer” approach to staff training to minimize staff time out of the office, what documentation should be available for the team to review?

A: A “train-the-trainer” approach, where one individual attends a training class and then presents the information to the staff in an in-house training session, is perfectly acceptable given the restrictions on out-of-State travel that some States are facing. If a State chooses to use a “train-the-trainer” approach, the State should document the date(s) that the in-house training was offered and retain a summary of the scope and objectives of the training or a copy of the agenda. The effectiveness of the training will be evaluated through the review of quality of casework and interviews with staff.

Response:

We agree with the comment. The question and answer will be added to Appendix B addressing this issue.