

U.S. NUCLEAR REGULATORY COMMISSION

DIRECTIVE TRANSMITTAL

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To: NRC Management Directives Custodians

Subject: Transmittal of Directive 5.10, "Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members"

Purpose: Directive and Handbook 5.10 provide the training and qualification process for the Integrated Materials Performance Evaluation Program team members and team leaders who conduct State and regional materials reviews. The handbook establishes minimum knowledge, skill, and ability qualifications standards for IMPEP team members (and team leaders) who participate from various offices and regions.

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Directive: 5.10 Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members

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OFFICE OF ADMINISTRATION

Formal Qualifications for
Integrated Materials
Performance Evaluation
Program (IMPEP) Team
Members

Directive
5.10

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U. S. Nuclear Regulatory Commission

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Formal Qualifications for Integrated Materials Performance Evaluation Program (IMPEP) Team Members Directive 5.10

Policy

(5.10-01)

It is the policy of the U.S. Nuclear Regulatory Commission to provide IMPEP team members and team leaders with sufficient knowledge to conduct State and regional program reviews to ensure that public health and safety is being adequately protected.

Objectives

(5.10-02)

To provide training and development for IMPEP team members to meet minimum knowledge, skill, and ability qualification standards through a standardized methodology.

Organizational Responsibilities and Delegations of Authority

(5.10-03)

Executive Director for Operations (EDO)

(031)

Oversees the establishment, operation, maintenance, and evaluation of technical and nontechnical training programs.

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Organizational Responsibilities and
Delegations of Authority
(5.10-03) (continued)

Directors, Office of State Programs (OSP) and
Office of Nuclear Material Safety
and Safeguards (NMSS), and
Regional Administrators
(032)

- Ensure all personnel acting as IMPEP team members or team leaders achieve and maintain qualifications in accordance with the guidelines provided in this directive. (a)
- Ensure that the Technical Training Division (TTD) is assisted in developing, monitoring, and reviewing training courses for the IMPEP team member and team leader qualification program. (b)

Director, Office of Human Resources (HR)
(033)

Establishes, operates, maintains, and evaluates technical and nontechnical training programs to improve individual and organizational performance in support of accomplishing the mission of the agency.

Immediate Supervisors of IMPEP
Team Members
(034)

Ensure that employees confirmed for training attend the training; adjust work schedules, as necessary; and only withdraw an employee from a course in the event of a personal or agency emergency.

Organizational Responsibilities and Delegations of Authority (5.10-03) (continued)

IMPEP Team Members (035)

- Attend courses for which attendance has been confirmed and devote the effort required to achieve the maximum benefit from the training program. (a)
- Evaluate courses and provide direct feedback to their supervisors. (b)

Applicability (5.10-04)

The policy and guidance in this directive and handbook apply to all NRC employees involved with IMPEP.

Handbook (5.10-05)

Handbook 5.10 provides training guidelines, qualifications, and maintenance requirements for IMPEP team members.

Definitions (5.10-06)

Core Training. Minimum formal classroom experience required for an IMPEP team member or team leader.

Equivalency Examination. An examination administered through the TTD, its contractors, or by management in lieu of specific course attendance.

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Definitions

(5.10-06) (continued)

Grandfathering. Qualification of an IMPEP team member to conduct independent State or regional program reviews in specific areas on the basis of previous experience and training.

Interim Qualification. Qualifications of an IMPEP team member to conduct independent State or regional program reviews in specified areas before completion of all IMPEP Training and Qualification Records requirements.

Refresher Training. Training designed to update and maintain qualification.

Self-Study Documents. Documents with which the general use and/or application an IMPEP team member should have a general understanding.

Supplemental Training. Additional training beyond that identified as required initial training to enhance a team member's technical expertise. The additional training will be determined by the individual's supervisor.

References

(5.10-07)

Code of Federal Regulations, Title 10 (10 CFR), "Energy."

NRC Inspection Manual, Chapter 0610, "Inspection Reports."

—, Chapter 1220, "Processing of NRC Form 241," Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20(b).

References

(5.10-07) (continued)

—, Chapter 1246, “Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area.”

—, Chapter 2401, “Nuclear Surface Low-Level Radioactive Waste Disposal Facility Evaluation Program.”

—, Chapter 2605, “Decommissioning Procedures For Fuel Cycle and Materials Licensees.”

—, Chapter 2641, “In-Situ Leak Facilities Inspection Program.”

—, Chapter 2800, “Materials Inspection Program.”

—, Chapter 2801, “Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program.”

NRC Inspection Procedure 88104, “Decommissioning Inspection Procedure For Fuel Cycle Facilities.”

NRC Management Directive —

5.6, “Integrated Materials Performance Evaluation Program (IMPEP).”

5.9, “Adequacy and Compatibility of Agreement State Programs.”

8.2, “NRC Incident Response Program.”

8.3, “NRC Incident Investigation Program.”

8.8, “Management of Allegations.”

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References

(5.10-07) (continued)

NRC Office of State Programs Internal Procedure B.7,
"Compatibility Categories and Health and Safety Identification for
NRC Regulations and Other Program Elements" (current revision).

NRC "Statement of Principle and Policy for the Agreement State
Program; Policy Statement on Adequacy and Compatibility of
Agreement State Programs," 62 FR 46517, September 3, 1997.

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Part I

General Training Information and Provisions

General (A)

The training and qualification process is intended to provide IMPEP team members and team leaders with sufficient knowledge to conduct State and regional materials program reviews that are technically correct and in accordance with NRC policies and procedures. NRC employees designated as IMPEP team members and team leaders must successfully complete the requirements for individually assigned areas, as listed in Part II of this handbook. In addition to the requirements of this handbook, other training may be necessary to supplement or enhance team member development. Exemption from specific training requirements may be granted in accordance with Section (C) of this part. (1)

Upon completion of the training listed in this handbook, the IMPEP team leader's or team member's understanding of the material may be evaluated orally by his or her immediate supervisor. (2)

An individual not yet qualified as an IMPEP team member may participate in an IMPEP review under the direction of an individual qualified to conduct the review for the specified performance indicator. (3)

To become qualified to act as principal reviewer of an indicator or become an IMPEP team leader, an individual must meet or complete the appropriate training and qualification requirements. (4)

Special circumstances (e.g., budget reductions, delays in establishing training course replacement contracts, or unavailability of critical instructors) may result in the temporary

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General (A) (continued)

unavailability of courses required for formal qualification. This does not remove the need for the qualifying individual to attend the required course or to receive equivalent training. (5)

The Director of the Office of State Programs (OSP) (or designee), Director of the Office of Nuclear Material Safety and Safeguards (NMSS) (or designee), regional administrator (or designee), or the Agreement State radiation control program director (or designee) may authorize an individual with previous successful IMPEP experience to participate in reviews through "grandfathering," even though the individual may not be fully qualified pursuant to this guidance. The basis for the authorization should be on alternate training and experience equivalent to that contained in this guidance document. (6)

Agreement State Radiation Control
IMPEP Team Members (B)

The Agreement State radiation control program director should ensure, at NRC's request in writing, that Agreement State personnel acting as IMPEP team members achieve and maintain qualifications in accordance with the guidelines in this handbook.

Guidelines (C)

Equivalency Examinations (1)

Equivalency examinations to validate specific course work may be taken by IMPEP team members or team leaders who, through prior experience and education, possess sufficient knowledge to otherwise meet the minimum requirements. Requests for equivalency examinations should be made from the individual's supervisor, along with any necessary additional management concurrence, to the Director, Technical Training Division, Office of

Guidelines (C) (continued)

Equivalency Examinations (1) (continued)

Human Resources. The supervisor should consider the candidate's ability to act as principal reviewer for a specific IMPEP performance indicator without the benefit of the additional knowledge and regulatory perspective that would be gained by attending the course. Use of these examinations is generally expected to be a rare occurrence.

Waivers (2)

The Director, OSP (or designee), the Director, NMSS (or designee), regional administrator (or designee), and Agreement State radiation control program director (or designee) have the authority to permanently waive any requirement or extend the time period for any requirement listed for an IMPEP team member in this handbook. Justification for the waiver or extension will be documented.

Grandfathering on the Basis of Previous Experience and Training (3)

An individual may be designated as qualified to independently review any appropriate performance indicator(s) through grandfathering. A grandfathering qualification process, determined on the basis of previous IMPEP experience, may be applied to any individual who has sufficient experience in State and/or regional IMPEP reviews conducted before the effective date of this management directive. The individual's immediate supervisor should consider the candidate's ability to act as principal reviewer for a specific IMPEP performance indicator without receiving the benefit of the additional training and/or on-the-job experience. The supervisor should notify his or her branch chief, office director, regional administrator, or Agreement State radiation control program director that the individual is recommended as qualified to conduct independent reviews of specified IMPEP performance

Guidelines (C) (continued)

Grandfathering on the Basis of Previous Experience and Training (3) (continued)

indicators through grandfathering. Post qualification training should be considered for all individuals grandfathered into IMPEP. The Director, OSP (or designee), the Director, NMSS (or designee), regional administrator (or designee), or Agreement State radiation control program director (or designee) will issue the grandfathering qualification. Justification for grandfathering will be documented.

Limited Review Qualification (4)

There are two separate qualification listings for the common performance indicator, Response to Incidents and Allegations. An IMPEP team member shall complete the training specified in both Sections (H) and (I) of Part II of this handbook to be fully qualified to act as principal reviewer for this indicator. An IMPEP team member who completes Part II(H) is qualified to complete the incident response review portion of this indicator. An IMPEP team member who completes Part II(I) is qualified to complete the allegation response review portion of this indicator. (a)

There are two separate qualification listings for the non-common performance indicator, sealed source and device (SS&D) evaluation program. Two types of reviews can be completed involving this indicator. (b)

- **Full technical review.** An IMPEP team member completing a full technical quality review shall be qualified (through education and experience) in all technical disciplines necessary to review all aspects of an SS&D program. The team member should be qualified to independently conduct a complete technical review of sealed source and device evaluations, assess technical staffing and training, and review the evaluation of defects and incidents regarding SS&Ds. (i)

Guidelines (C) (continued)

Limited Review Qualification (4) (continued)

- **Limited-scope technical review.** An IMPEP team member completing a limited-scope technical review of an SS&D program shall have substantial knowledge of a radioactive materials regulatory program, as well as an understanding of health physics and mechanics along with the technical ability to discern the safety significance of product integrity issues. A team member's review of the technical quality of product evaluation and evaluation of defects and incidents regarding SS&Ds should be of broad scope and not focus on any one specific technical aspect. An IMPEP team member conducting a limited-scope technical review of an SS&D program is qualified to review the technical staffing and training of an SS&D program. (ii)

The principal reviewer for the non-common performance indicator, low-level radioactive waste (LLRW) disposal program, shall be qualified to review at least one technical aspect of an LLRW disposal program. The team member's review of the technical quality of inspections, technical quality of licensing actions, and response to incidents and allegations, should focus on the aspect of the LLRW program in which the team member has experience (e.g., health physics, environmental monitoring, hydrology, or performance assessment). Additionally, unless the team member has licensing experience, an LLRW inspector may be limited to a review of technical quality of inspections. Similarly, an experienced LLRW license reviewer may not be qualified to evaluate technical quality of inspections. An IMPEP team member acting as principal reviewer for this indicator is qualified to review the status of inspections and technical staffing and training aspects of an LLRW program.(c)

The principal reviewer for the non-common performance indicator, uranium recovery program, shall be qualified to review at least one technical aspect of a uranium recovery program. The team

Guidelines (C) (continued)

Limited Review Qualification (4) (continued)

member's review of the technical quality of inspections, technical quality of licensing actions, and response to incidents and allegations, should focus on the aspect of the uranium recovery program in which the team member has experience (e.g., health physics or environmental monitoring). Additionally, unless the team member has licensing experience, a uranium recovery facility inspector may be limited to a review of technical quality or inspections. Similarly, an experienced uranium recovery facility license reviewer may not be qualified to evaluate technical quality of inspections. An IMPEP team member acting as principal reviewer for this indicator is qualified to review the status of inspections and technical staffing and training aspects of a uranium recovery program.(d)

Interim IMPEP Team Member Qualification (5)

An IMPEP team member who has not completed all requirements for final qualification under the applicable listing in the handbook may obtain interim qualification to take part in an IMPEP review. The individual's supervisor will evaluate the individual's qualifications, identify the performance indicator(s) for which interim qualification is appropriate, and request management approval. A request will then be generated through the individual's management for interim qualification in the identified area(s). The request will be approved by the Director, OSP (or designee) for OSP staff; by the Director, NMSS (or designee) for NMSS staff; by the appropriate regional administrator (or designee) for NRC regional staff; or by the appropriate Agreement State radiation control program director (or designee) for Agreement State staff. Approval of interim qualification will be documented and a record kept in the individual's training file.

Guidelines (C) (continued)

Post Qualification Training (6)

This handbook identifies training requirements beyond those that are required for initial qualification for the experienced IMPEP team member or team leader. For team members who have received certification of initial qualification, additional training is identified in "Supplemental Training" and "Refresher Training," respectively, for each indicator in Part II of the handbook. Refresher training is required as specified and must be taken at the given frequency following initial qualification. This additional training recognizes that IMPEP team leader or team member training does not stop with initial qualification, but that training should be made available for experienced team members on the basis of need, special circumstances, and the necessity of keeping current with NRC and Agreement State materials programs.

Program Revisions (7)

This handbook will be periodically revised to reflect the training needs of IMPEP team members and team leaders as determined by changes to the IMPEP review program. When a revision is issued, personnel who qualified under previous requirements shall remain qualified, but must complete any new training requirements in their area within 3 years from the date of the revision, if they wish to retain their eligibility. Personnel in the process of qualifying when a revision is issued, may complete their qualification under their original requirements, but must complete any new formal classroom training requirements in their area within 3 years from the date of the revision, if they wish to retain their eligibility. Exemptions to specific newly revised formal training requirements and extensions to the 3-year time period can be granted using the procedures outlined in Section (C)(2) of this part.

Part II

Specific Training Requirements

Basic Requirements (A)

IMPEP team members are expected to have a Bachelor's degree or equivalent training or experience in the physical, life sciences, engineering, or other appropriate fields. (1)

Individuals assigned as IMPEP team members or team leaders must successfully complete the general IMPEP team member requirements as described in Part I of this handbook, as well as the applicable requirements listed in Sections (B) through (Q) of this part. (2)

Written examinations will be used for designated courses to evaluate the candidate's understanding of the material. The passing grade for most examinations is 70 percent. (3)

Not all courses have formal examinations. In these cases, satisfactory course completion is determined by attendance and completion of class activities. (4)

Individuals who fail examinations may be given the opportunity to review the material through self-study and then be reexamined. If deemed necessary, individuals who fail a course may repeat the course in accordance with established policy of the Technical Training Division (TTD), Office of Human Resources. (5)

In all cases, completion of formal training courses will be documented by official correspondence from the provider of the training (normally TTD) and will be recorded in the agencywide training tracking system (NRC employees). (6)

Training Requirements for All IMPEP Team Members (B)

The training described below is required for all IMPEP team members.

Self-Study (1)

- NRC or Agreement State Orientation (a)
- NRC Management Directive 5.6, "Integrated Materials Performance Evaluation Program (IMPEP)" (b)
- 10 CFR Parts 19 and 20 (c)
- 10 CFR Parts 30-36 and 39 (d)
- 10 CFR Parts 40, 70, and 71 (e)
- 10 CFR Part 150 (State reviews) (f)
- Final Statement of Principle and Policy for the Agreement State Programs (State reviews) (g)
- Final Policy Statement on Adequacy and Compatibility of Agreement State Programs (State reviews) (h)

Core Training (2)

The course, IMPEP Training, currently establishes the minimum formal classroom training required for all IMPEP team members. Refer to Part I(C) of this handbook for exceptions to these requirements.

Training Requirements for All IMPEP Team Members (B) (continued)

Supplemental Training (3)

Courses may be developed to provide additional training beyond that identified as required training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members is 2 years experience with a radioactive materials program (including Agreement State program, fuel cycle, radioactive waste, or sealed source and device evaluation) before and within 5 years of participating in IMPEP.

Principal Reviewer for Status of Materials Inspection Program Indicator (C)

Along with the qualifications outlined in Section (B) of this part, the training described below, or equivalent, is required for all IMPEP team members acting as principal reviewer for the common performance indicator, status of materials inspection program.

Self-Study (1)

The reviewer should be familiar with the following:

Principal Reviewer for Status of Materials Inspection Program Indicator (C) (continued)

Self-Study (1) (continued)

- NRC Inspection Manual Chapter 2800, “Materials Inspection Program” (a)
- NRC Inspection Manual Chapter 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20 (b)
- NRC Inspection Manual Chapter 0610, “Inspection Reports” (c)

Core Training (2)

Currently, the course, IMPEP Training, establishes the minimum formal classroom training requirement for all IMPEP team members acting as principal reviewer for the common performance indicator, status of materials inspection program.

Supplemental Training (3)

The following courses provide additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108) (a)
- Inspecting for Performance—Materials Version (G-304) (b)
- Root Cause/Incident Investigation Workshop (G-205) (c)

Principal Reviewer for Status of Materials Inspection Program Indicator (C) (continued)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members acting as principal reviewer for the common performance indicator, status of materials inspection program, is 2 years experience with a radioactive materials program (including Agreement State program, fuel cycle, radioactive waste, or sealed source and device evaluation) before and within 5 years of participating in IMPEP.

Principal Reviewer for Technical Quality of Inspections Indicator (D)

Qualifications (1)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below, or equivalent, is required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of inspections, and/or completing inspector accompaniments. (a)

An IMPEP team member that is journal qualified as an inspector under NRC Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program Area," or Agreement State equivalent, is by definition technically qualified to act as principal reviewer for this indicator. (b)

Principal Reviewer for Technical Quality of Inspections Indicator (D) (continued)

Self-Study (2)

The reviewer should be familiar with the following:

- NRC Inspection Manual Chapter 2800, “Materials Inspection Program” (a)
- NRC Inspection Manual Chapter 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20 (b)
- NRC Inspection Manual Chapter 0610, “Inspection Reports” (c)
- NRC Inspection Procedure 87100 Series, “Licensed Materials Programs” (d)
- All applicable temporary instructions related to materials programs (e)

Core Training (3)

The following courses establish minimum formal classroom training requirements for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of inspections.

- Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108) (a)
- Root Cause/Incident Investigation Workshop (G-205) (b)
- Inspecting for Performance Course—Materials Version (G-304) (c)

Principal Reviewer for Technical Quality of Inspections Indicator (D) (continued)

Core Training (3) (continued)

- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (d)
- Diagnostic and Therapeutic Nuclear Medicine Course (H-304) (e)
- Safety Aspects of Industrial Radiography Course (H-305) (f)
- Transportation of Radioactive Materials Course (H-308) (g)
- Teletherapy and Brachytherapy Course (H-313) (h)

Supplemental Training (4)

The following courses provide additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Environmental Monitoring for Radioactivity Course (H-111) (a)
- Air Sampling for Radioactive Material Course (H-119) (b)
- Radiological Surveys in Support of Decommissioning (H-120) (c)
- Respiratory Protection Course (H-311) (d)
- Internal Dosimetry & Whole Body Counting Course (H-312) (e)
- Safety Aspects of Well Logging Course (H-314) (f)

Principal Reviewer for Technical Quality of Inspections Indicator (D) (continued)

Supplemental Training (4) (continued)

- Irradiator Technology Course (H-315) (g)

Refresher Training (5)

Refresher training will include the following courses and other courses as determined by management:

- Fundamentals of Inspection Refresher Course (G-102) (a)
- Health Physics Topical Review Course (H-401) (b)

Professional Experience (6)

The minimum amount of work experience required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of inspections, is 2 years as an independent inspector before and within 5 years of participating in IMPEP.

Principal Reviewer for Technical Staffing and Training Indicator (E)

Qualifications (1)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical staffing and training. (a)

An IMPEP team member that is journal qualified as an inspector or license reviewer under NRC Inspection Manual Chapter 1246,

Principal Reviewer for Technical Staffing and Training Indicator (E) (continued)

Qualifications (1) (continued)

“Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program Area,” or Agreement State equivalent, is by definition technically qualified to act as principal reviewer for this indicator. (b)

Self-Study (2)

The reviewer should be familiar with the following:

- NRC Inspection Manual Chapter 1246, “Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area” (a)
- NRC/Organization of Agreement States Training Working Group Recommendations for Agreement State Training Programs for State reviews (b)

Core Training (3)

Currently, the course, IMPEP Training, establishes the minimum formal classroom training requirement for all IMPEP team members acting as principal reviewer for the common performance indicator, technical staffing and training.

Supplemental Training (4)

The following course provides additional training beyond that identified as required self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

Principal Reviewer for Technical Staffing and Training Indicator (E) (continued)

Supplemental Training (4) (continued)

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (5)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (6)

The minimum amount of work experience required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical staffing and training, is 2 years experience with a radioactive materials program (including Agreement State program, fuel cycle, radioactive waste, or sealed source and device evaluation) before and within 5 years of participating in IMPEP.

Principal Reviewer for Technical Quality of Licensing Actions (F)

Qualifications (1)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of licensing actions. (a)

An IMPEP team member that is journal qualified as a license reviewer under NRC Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Materials Safety

Principal Reviewer for Technical Quality of Licensing Actions (F) (continued)

Qualifications (1) (continued)

and Safeguards Program Area,” or Agreement State equivalent, is by definition qualified to act as principal reviewer for this indicator.
(b)

Self-Study (2)

The reviewer should be familiar with the following:

- NRC Inspection Manual Chapter 2800, “Materials Inspection Program” (a)
- NRC Inspection Manual Chapter 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-Agreement States, and Inspection of Agreement State licensees operating under 10 CFR 150.20 (b)
- NRC Inspection Procedure 87100 Series, “Licensed Materials Programs” (c)

Core Training (3)

The following courses establish minimum formal classroom training requirements for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of licensing actions.

- Licensing Practices and Procedures (G-109) (a)
- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (b)

Principal Reviewer for Technical Quality of Licensing Actions (F) (continued)

Core Training (3) (continued)

- Diagnostic and Therapeutic Nuclear Medicine (H-304) (c)
- Safety Aspects of Industrial Radiography (H-305) (d)
- Transportation of Radioactive Materials (H-308) (e)
- Teletherapy and Brachytherapy (H-313) (f)

Supplemental Training (4)

The following courses provide additional training beyond that identified as self-study and core training. This training, or equivalent, will be determined by the individual's supervisor and will depend on the individual's previous work experience.

- Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108) (a)
- Environmental Monitoring for Radioactivity Course (H-111) (b)
- Air Sampling for Radioactive Material Course (H-119) (c)
- Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Course (H-121) (d)
- Respiratory Protection (H-311) (e)
- Internal Dosimetry & Whole Body Counting Course (H-312) (f)
- Safety Aspects of Well Logging (H-314) (g)
- Irradiator Technology (H-315) (h)

Principal Reviewer for Technical Quality of Licensing Actions (F) (continued)

Supplemental Training (4) (continued)

- Root Cause/Incident Investigation Workshop (G-205) (i)

Refresher Training (5)

Refresher training will include the following course and other courses as determined by management:

- Health Physics Topical Review Course (H-401)

Professional Experience (6)

The minimum amount of work experience required for all IMPEP team members acting as principal reviewer for the common performance indicator, technical quality of licensing actions, is 2 years as an independent license reviewer before and within 5 years of participating in IMPEP.

Principal Reviewer for Response to Incidents and Allegations Indicator (G)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described in both Sections (H) and (I) of this part are required for all IMPEP team members acting as principal reviewer for the common performance indicator, response to incidents and allegations. (1)

An IMPEP team member is qualified to perform an incident response limited review by completing the qualifications outlined in Section (H) of this part. Similarly, an IMPEP team member is qualified to perform an allegation response limited review by completing the qualifications outlined in Section (I) of this part. (2)

Principal Reviewer for Response to
Incidents and Allegations Indicator (G) (continued)

An IMPEP team member that is journal qualified as an inspector under NRC Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program Area," or Agreement State equivalent, is by definition technically qualified to act as principal reviewer for this indicator. (3)

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Incident Response
Limited Review (H)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing an incident response limited review as part of the common performance indicator, response to incidents and allegations.

Self-Study (1)

- NRC Management Directive 8.2, "NRC Incident Response Program" (a)
- NRC Management Directive 8.3, "NRC Incident Investigation Program" (b)
- NRC Inspection Manual Chapter 2800, "Materials Inspection Program," including guidance on allegations, references on incident response, and interactions with other agencies (c)
- NUREG-1303, "Incident Investigation Manual" (d)

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Incident Response
Limited Review (H) (continued)

Self-Study (1) (continued)

- Handbook on Nuclear Materials Event Reporting in the Agreement States (State reviews) (e)
- Nuclear Materials Event Database (f)

Core Training (2)

These courses establish minimum formal classroom training requirements for all IMPEP team members completing an incident response limited review as part of the common performance indicator, response to incidents and allegations.

- Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108) (a)
- Root Cause/Incident Investigation Workshop (G-205) (b)
- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (c)
- Diagnostic and Therapeutic Nuclear Medicine Course (H-304) (d)
- Safety Aspects of Industrial Radiography Course (H-305) (e)
- Transportation of Radioactive Materials Course (H-308) (f)
- Teletherapy and Brachytherapy Course (H-313) (g)

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Incident Response
Limited Review (H) (continued)

Supplemental Training (3)

The following courses provide additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Environmental Monitoring for Radioactivity Course (H-111) (a)
- Air Sampling for Radioactive Material Course (H-119) (b)
- Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Course (H-121) (c)
- Respiratory Protection Course (H-311) (d)
- Internal Dosimetry & Whole Body Counting Course (H-312) (e)
- Safety Aspects of Well Logging Course (H-314) (f)
- Irradiator Technology Course (H-315) (g)

Refresher Training (4)

Refresher training will include the following courses and other courses as determined by management:

- Fundamentals of Inspection Refresher Course (G-102) (a)
- Health Physics Topical Review Course (H-401) (b)

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Incident Response
Limited Review (H) (continued)

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members completing an incident response limited review as part of the common performance indicator, response to incidents and allegations, is to have had some involvement with incident response (e.g., experience in NRC's incident response group in headquarters or a regional office, experience with inspection or assessment of incident response programs) before and within 5 years of participating in IMPEP.

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Allegation Response
Limited Review (I)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing an allegation response limited review as part of the common performance indicator, response to incidents and allegations. (**Note:** Only NRC personnel will review this indicator during NRC regional reviews.)

Self-Study (1)

The reviewer should be familiar with the following:

- NRC Management Directive 8.8, "Management of Allegations" (a)

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Allegation Response
Limited Review (I) (continued)

Self-Study (1) (continued)

- NRC Allegation Memoranda, 96-01, 96-02, and 98-01 (b)

Core Training (2)

Currently, the course, IMPEP Training, establishes the minimum formal classroom training requirement for all IMPEP team members completing an allegation response limited review as part of the common performance indicator, response to incidents and allegations.

Supplemental Training (3)

The following course provides additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members completing an allegation response limited review as part of the common performance indicator, response to

Principal Reviewer for Response to
Incidents and Allegations
Indicator—Allegation Response
Limited Review (I) (continued)

Professional Experience (5) (continued)

incidents and allegations, is to have had some involvement with allegations (e.g., receipt of allegations, interviewing alleged, inspecting/investigating allegations, participating in allegation review boards, corresponding with alleged, or serving as an office allegation coordinator) before and within 5 years of participating in IMPEP.

Principal Reviewer for Legislation and
Program Elements Required for
Compatibility Indicator (J)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, legislation and program elements required for compatibility.

Self-Study (1)

- NRC Management Directive 5.9, "Adequacy and Compatibility of Agreement State Programs" (a)
- Office of State Programs Internal Procedure B.7, "Compatibility Categories and Health and Safety Identification for NRC Regulations and Other Program Elements" (b)

Principal Reviewer for Legislation and
Program Elements Required for
Compatibility Indicator (J) (continued)

Core Training (2)

Currently, the course, IMPEP Training, establishes the minimum formal classroom training requirements for all IMPEP team members acting as principal reviewer for the common performance indicator, legislation and program elements required for compatibility.

Supplemental Training (3)

The following course provides additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous work experience and planned IMPEP activities in specific areas.

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, legislation and program elements required for compatibility, is direct involvement in some aspect of the promulgation of NRC or Agreement State regulations before and within 3 years of participating in IMPEP or the review of two Agreement State regulations for compatibility before and within 2 years of participating in IMPEP.

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Full
Technical Review (K)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, sealed source and device (SS&D) evaluation program.

Self-Study (1)

- NUREG-1556, Vol. 3, "Consolidated Guidance About Materials Licenses" (a)
- ANSI N538-1979, "Classification of Industrial Ionizing Radiation Gauging Devices" (b)
- ANSI N542-1977, "Sealed Radioactive Source Classification" (c)
- Regulatory Guide 6.9, "Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material" (d)

Core Training (2)

The following courses establish minimum formal classroom training requirements for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, SS&D evaluation program.

- Sealed Source and Device Workshop (a)

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Full
Technical Review (K) (continued)

Core Training (2) (continued)

- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (b)

Supplemental Training (3)

The following courses provide additional training beyond that identified as required initial training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Diagnostic and Therapeutic Nuclear Medicine Course (H-304) (a)
- Safety Aspects of Industrial Radiography Course (H-305) (b)
- Teletherapy and Brachytherapy Course (H-313) (c)
- Safety Aspects of Well Logging Course (H-314) (d)
- Root Cause/Incident Investigation Workshop (G-205) (e)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Full
Technical Review (K) (continued)

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, SS&D evaluation program, is 2 years as an independent SS&D reviewer before and within 5 years of participating in IMPEP.

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Limited
Scope Technical Review (L)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing a limited scope technical review as principal reviewer for the non-common performance indicator, SS&D evaluation program.

Self-Study (1)

- NUREG-1556, Vol. 3, "Consolidated Guidance About Materials Licenses." (a)
- ANSI N538-1979, "Classification of Industrial Ionizing Radiation Gauging Devices" (b)
- ANSI N542-1977, "Sealed Radioactive Source Classification" (c)

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Limited
Scope Technical Review (L) (continued)

Self-Study (1) (continued)

- Regulatory Guide 6.9, "Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material" (d)

Core Training (2)

The following courses establish minimum formal classroom training requirements for all IMPEP team members completing a limited scope technical review as principal reviewer for the non-common performance indicator, SS&D evaluation program.

- Sealed Source and Device Workshop (a)
- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (b)

Supplemental Training (3)

The following courses provide additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Diagnostic and Therapeutic Nuclear Medicine Course (H-304) (a)
- Safety Aspects of Industrial Radiography Course (H-305) (b)
- Teletherapy and Brachytherapy Course (H-313) (c)

Principal Reviewer for the Sealed
Source and Device Evaluation
Program Indicator Limited
Scope Technical Review (L) (continued)

Supplemental Training (3) (continued)

- Safety Aspects of Well Logging Course (H-314) (d)
- Root Cause/Incident Investigation Workshop (G-205) (e)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members completing a limited scope technical review as principal reviewer for the non-common performance indicator, SS&D evaluation program, is 5 years experience with a radioactive materials program (including knowledge in health physics and mechanics along with the technical ability to discern the safety significance of product integrity issues) before and within 10 years of participating in IMPEP.

Principal Reviewer for the Low-Level
Radioactive Waste Disposal Program
Indicator (M)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing a technical review as principal reviewer for

Principal Reviewer for the Low-Level
Radioactive Waste Disposal Program
Indicator (M) (continued)

the non-common performance indicator, low-level radioactive waste (LLRW) disposal program.

Self-Study (1)

- NUREG-1199, "Standard Format & Content of a License Applications for a Low-Level Radioactive Waste Disposal Facility" (a)
- NUREG-1200, "Standard Review Plan for the Review of a License Application for a Low-Level Radioactive Waste Disposal Facility" (b)
- NUREG-1274, "Review Process for Low-Level Radioactive Waste Disposal License Applications Under Low-Level Radioactive Waste Policy Amendments Act" (c)
- NRC Inspection Manual Chapter 2401, "Near Surface Low-Level Radioactive Waste Disposal Facility Evaluation Program" (d)
- Draft Branch Technical Position, "Low-Level Radioactive Waste Performance Assessment" (e)
- 10 CFR Part 61 (f)

Core Training (2)

The course, IMPEP Training, establishes the minimum formal classroom training requirements for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, LLRW disposal program.

Principal Reviewer for the Low-Level
Radioactive Waste Disposal Program
Indicator (M) (continued)

Supplemental Training (3)

The following course provides additional training beyond that identified as self-study and core training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

Minimum amount of work experience required for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, LLRW disposal program, is 2 years experience working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of LLRW disposal before and within 5 years of participating in IMPEP.

Principal Reviewer for the Uranium
Recovery Program Indicator (N)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members completing a technical review as principal reviewer for the non-common performance indicator, uranium recovery program.

Principal Reviewer for the Uranium
Recovery Program Indicator (N) (continued)

Self-Study (1)

- 10 CFR Part 40, Appendix A (a)
- NUREG-1569, "Standard Review Plan for In Situ Leach Uranium Extraction License Applications" (b)
- NUREG-1620, "Standard Review Plan for the Review of a Reclamation Plan for Mill Tailings Sites Under Title II of the Uranium Mill Tailings Radiation Control Act" (c)
- NRC Inspection Manual Chapter 2801, "Uranium Mill and 11e.(2) Byproduct Material Disposal Site and Facility Inspection Program" (d)
- NRC Inspection Manual Chapter 2641, "In-Situ Leach Facility Inspection Program" (e)

Core Training (2)

The course, IMPEP Training, establishes the minimum formal classroom training requirements for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, uranium recovery program.

Supplemental Training (3)

The following course provides additional training beyond that identified as self-study and core training will be determined by the individual's supervisor and will depend on the individual's previous education and work experience.

- Root Cause/Incident Investigation Workshop (G-205)

Principal Reviewer for the Uranium Recovery Program Indicator (N) (continued)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience required for all IMPEP team members completing a full technical review as principal reviewer for the non-common performance indicator, uranium recovery program, is 2 years experience working as an inspector, license reviewer, or as a developer of regulatory programs for ensuring safety of uranium recovery operations before and within 5 years of participating in IMPEP.

Principal Reviewer for Fuel Cycle Inspection Program Indicator (O)

Qualifications (1)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, fuel cycle inspection program. (a)

An IMPEP team member who is journal qualified as a fuel cycle inspector or license reviewer under NRC Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Materials Safety and Safeguards Program Area," is by definition qualified to act as principal reviewer for this indicator. (b)

Principal Reviewer for Fuel Cycle
Inspection Program Indicator (O) (continued)

Self-Study (2)

None, in addition to those courses identified in Section (B)(1) of this part.

Core Training (3)

The course, IMPEP Training, establishes the minimum formal classroom training requirement for all IMPEP team members acting as principal reviewer for the non-common performance indicator, fuel cycle inspection program.

Supplemental Training (4)

The following course provides additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous work experience and education.

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (5)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (6)

The minimum amount of work experience directly related to fuel cycles required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, fuel cycle inspection program, is 2 years experience with a radioactive materials program (including Agreement State program, fuel cycle, radioactive waste, or SS&D evaluation) before and within 5 years of participating in IMPEP.

Principal Reviewer for Site Decommissioning Management Plan Indicator (P)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, site decommissioning management plan.

Self-Study (1)

- *Code of Federal Regulations* described in NRC Inspection Manual Chapter 1246, Appendix X, "Qualification Guide 2" (a)
- Regulatory Guidance described in NRC Inspection Manual Chapter 1246, Appendix X, "Qualification Guide" 4 (b)
- NRC Inspection Manual Chapter 2605, "Decommissioning Procedures for Fuel Cycle and Materials Licensees," and NMSS Handbook for Decommissioning Fuel Cycle and Materials Licenses (c)

Core Training (2)

The following courses establish minimum formal classroom training requirements for all IMPEP team members acting as principal reviewer for the non-common performance indicator, site decommissioning management plan.

- One of the following: (a)
 - Site Access Training (H-100) (i)
 - NMSS Radiation Worker Training (H-102) (ii)
 - Introduction to Health Physics (H-117) (iii)
 - Health Physics Technology (H-201) (iv)
- Licensing Practices and Procedures (G-109) (b)

Principal Reviewer for Site Decommissioning Management Plan Indicator (P) (continued)

Supplemental Training (3)

The following course provides additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous work experience and education.

- Root Cause/Incident Investigation Workshop (G-205)

Refresher Training (4)

Refresher training will include IMPEP Training a minimum of once every 2 years and other courses as determined by management.

Professional Experience (5)

The minimum amount of work experience directly related to decommissioning required for all IMPEP team members acting as principal reviewer for the non-common performance indicator, site decommissioning management plan, is 2 years experience with a radioactive materials program (including Agreement State program, fuel cycle, radioactive waste, or SS&D evaluation) before and within 5 years of participating in IMPEP.

Training Requirements for IMPEP Team Leader (Q)

Along with the qualifications outlined in Sections (A) and (B) of this part, the training described below is required for all IMPEP team leaders.

Training Requirements for IMPEP

Team Leader (Q) (continued)

Self-Study (1)

- NRC Inspection Manual Chapters 1220, “Processing of NRC Form 241,” Report of Proposed Activities in Non-agreement States, and inspection of Agreement State licensees operating under 10 CFR 150.20 (a)
- NRC Inspection Manual Chapter 1246, “Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area” (b)
- NRC Inspection Manual Chapter 2800, “Materials Inspection Program” (c)
- NRC Management Directive 8.8, “Management of Allegations” (d)

Core Training (2)

The following courses establish minimum formal classroom training requirements for all IMPEP team leaders.

- Fundamentals of Inspection Course (G-101) or Inspection Procedures Course (G-108) (a)
- Licensing Practices and Procedures (G-109) (b)
- Inspection for Performance—Materials Version (G-304) (c)
- Applied Health Physics (H-109) or Health Physics Technology Course (H-201) (d)
- Leading NRC Work Teams (Professional Development Center [PDC]) (e)

Training Requirements for IMPEP

Team Leader (Q) (continued)

Supplemental Training (3)

The following courses provide additional training beyond that identified as self-study and core training. This training will be determined by the individual's supervisor and will depend on the individual's previous work experience and education.

- Root Cause/Incident Investigation Workshop (G-205) (a)
- Diagnostic and Therapeutic Nuclear Medicine (H-304) (b)
- Safety Aspects of Industrial Radiography (H-305) (c)
- Transportation of Radioactive Materials (H-308) (d)
- Teletherapy and Brachytherapy (H-313) (e)
- Safety Aspects of Well Logging (H-314) (f)
- Irradiator Technology (H-315) (g)
- Managing Other People's Writing (PDC) (h)
- Situational Leadership (PDC) (i)
- Effective Communications for NRC Inspectors (OP) (j)
- IMPEP Team Leader Course (k)

Refresher Training (4)

Refresher training will include the IMPEP Team Leader Course and other courses as determined by management.

Training Requirements for IMPEP
Team Leader (Q) (continued)

Professional Experience (5)

Professional experience will include—

- Minimum amount of work experience required for all IMPEP team leaders (a)
- 5 years of experience with a radiation materials program before and within 10 years of participating in IMPEP (b)
- Qualified to act as principal reviewer for at least one performance indicator (c)
- Participation in one IMPEP review as a principal reviewer for any indicator (d)
- A first-time leader shall have an experienced qualified team leader as a member of the IMPEP team (e)