Appendix C3

Fuel Facility Emergency Preparedness Inspector

Technical Proficiency

Training and Qualification Journal

Table of Contents

Introduction

Consult with your supervisor prior to beginning the activities or completing the courses in this qualification journal. In most cases, you will need to complete the Basic Inspector Certification Journal prior to beginning the activities in this Appendix. You may complete the General Proficiency requirements contained in Appendix B together with the Technical Proficiency requirements outlined in this journal.

Several of the topics have both an individual study guide and on-the-job training. You must complete the individual study guide before beginning the corresponding on-the-job training.

Before signing up for any course, be sure that you have checked and have met any prerequisites.

Required Emergency Preparedness Inspector Training Courses:
(These courses have the completion of Appendix A of IMC 1247 as a prerequisite)

(F-206S) Fire Protection for Fuel Cycle Facilities Self-Study Course
Chemical Safety for Fuel Cycle Facilities Course

Required Refresher Training:
(To be completed every three years)

(F-401) Fundamentals of Inspection Refresher for Fuel Facilities Inspectors (should be done every two years)
(G-102) Fundamentals of Inspection Refresher (alternate if F-401 is not available)

Fuel Facility Emergency Preparedness Inspector

Study Guides

Fuel Facility Emergency Preparedness Inspector Study Guide

TOPIC: (SG-EP-1) Code of Federal Regulations for Emergency Preparedness Inspectors

PURPOSE: The purpose of this activity is to familiarize you with the regulations having direct application to emergency preparedness inspections and the licensee's emergency management program. By ensuring that the site is in compliance with requirements in the Code of Federal Regulations (CFR), we can determine the emergency management program is adequate and maintained in a state of readiness to protect workers, the public, and the environment.

COMPETENCY AREA: REGULATORY FRAMEWORK
TECHNICAL EXPERTISE

LEVEL OF EFFORT: 8 hours

REFERENCES:

1. 10 CFR Part 70.22, "Contents of Applications" subsection (i)(3)
2. 10 CFR Part 70.32, "Conditions of Licenses" subsection (i)
3. 10 CFR Part 40.31, "Application for Specific Licenses" subsection (j)(3)
4. 10 CFR Part 40.35, "Conditions of Specific Licenses Issued Pursuant to Subsection 40.34" subsection (f)
5. 10 CFR Part 76.91, "Emergency Planning"
6. 10 CFR Part 76.91, "Emergency Planning" subsection (o)
7. NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" (ML013380540)

EVALUATION CRITERIA: Upon completion of this SG, the inspector should be able to:

1. Describe each of the planning standards for an emergency response plan.
2. Discuss which emergency response planning standards are risk significant.
3. Explain the requirements for making changes to the Emergency Plans as presented in 10 CFR Part 40, 10 CFR

Part 70, and 10 CFR Part 76.

4. Discuss the limits for exposure to the general public during an event.

TASKS:

1. Review pertinent sections of 10 CFR Part 40.31, 10 CFR Part 70.22, and 10 CFR Part 76.91 to familiarize yourself with the information which must be contained in Emergency Plans.

2. Review Section 8 of NUREG-1520 for contents of an Emergency Plan considered acceptable by license reviewers.

3. Meet with your supervisor, the person designated as a resource, or a qualified Fuel Facility Emergency Preparedness Inspector to discuss any questions you may have as a result of these activities. Discuss the answers to the questions listed under the Evaluation Criteria section of this study guide with your supervisor or the person designated as a resource.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item SG-EP-1.

Fuel Facility Emergency Preparedness Inspector Study Guide

TOPIC: (SG-EP-2) Preparation and Evaluation of Radiological Emergency Plans

PURPOSE: The purpose of this activity is to familiarize you with the criteria used by NRC licensed facilities to develop radiological Emergency Plans and improve emergency preparedness. Emergency Plans submitted under 10 CFR Parts 40, 70, and 76 must include the planning standards listed in 10 CFR Parts 40.31, 70.22, and 76.91.

COMPETENCY AREA: TECHNICAL AREA EXPERTISE
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 16 hours

REFERENCES:

1. Regulatory Guide (RG) 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Material Facilities" (ML003739885)

2. NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" (ML013380540)

3. NUREG-1140, "A Regulatory Analysis of Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees" (ML062020791)

EVALUATION CRITERIA: **Upon** the completion of this SG, the inspector should be able to:

1. Discuss key elements of the basis for emergency planning.

2. Discuss the general topics of the emergency planning standards.

3. Discuss the difference between the two emergency classification levels in terms of safety significance to the public

4. Discuss the key functions performed by members of the licensee's emergency response organization, including the personnel responsible for emergency classification during normal operations and back shifts.

5. Discuss the notification process and timeliness for completing offsite notifications (State, local, and NRC).

6. Discuss response plans for restoring the facility to a safe status following an accident.

TASKS:

1. Obtain a copy of NUREG-1520 and review Section 8.0.

2. Obtain a copy of RG 3.67 and read it in its entirety.

3. Obtain a copy of NUREG-1140 and read Sections 1.0 and 2.0.

4. Meet with your supervisor, the person designated as a resource, or a qualified Fuel Facility Emergency Preparedness Inspector to discuss any questions you may have as a result of these activities. Discuss the answers to the questions listed under the Evaluation Criteria section of this study guide with your supervisor or the person designated as a resource.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item SG-EP-2

TOPIC: (SG-EP-3) Manual of Protective Action Guides and Protective Actions for Nuclear Incidents

PURPOSE: The purpose of this activity is to familiarize you with the guidance used by decision makers for State, local, and NRC regarding the appropriate protective action recommendations (PARs) in the event of a radiological emergency.

COMPETENCY AREA: INSPECTION
TECHNICAL AREA EXPERTISE

LEVEL OF EFFORT: 24 hours

REFERENCES:

1. EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (ML003769701)
2. NRC Response Technical Manual (RTM)
3. NUREG-1140, "A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and other Radioactive Material Licensees" (ML062020791)
4. Defense Nuclear Facilities Safety Board letter regarding red oil dated November 13, 2003
5. Memorandum dated March 10, 2003, "Regulatory Authority Over Chemical Hazards At Fuel Cycle Facilities" (ML030700317)
6. SECY 02-0216, "Proposed Process For Providing Information On Significant Nuclear Materials Issues And Adverse Licensee Performance" (ML022410435)

EVALUATION CRITERIA: Upon completion of this Study Guide, the inspector should be able to:

1. Discuss protective action guides (PAGs) and the use of PAGs in planning for protective actions to safeguard the public and environment.
2. Discuss the different phases of an accident.
3. Discuss the PAGs for the early phase of an accident.

4. Discuss the range of possible protective action recommendations.

5. Discuss possible exceptions to implementing the protective actions.

6. Discuss the PAGs for the late phase of an accident.

7. Discuss the various exposure pathways.

8. Discuss fuel cycle events, offsite consequences, and the anticipated response by State, local, and Federal authorities.

9. Discuss the possible consequences of a uranium hexafluoride (UF_6) release and determine the need for protective actions.

10. Describe the concern with the red oil phenomenon and how facilities protect against it.

11. Describe your Regulatory Authority Over Chemical Hazards At Fuel Cycle Facilities.

12. Chemical Safety Training from the University of Illinois at Chicago on Hydrofluoric Acid

13. Honeywell Special Chemicals Training Presentation on Hydrofluoric Acid

14. Interim Guidance - Inspector Duties/Responsibilities During Terrorist-Based Threats/Attacks at Region II Reactor and Fuel Facilities

TASKS:

1. Obtain a copy of EPA 400-R-92-001 and read chapters 1 through 5.

2. Obtain a current copy of the NRC RTM and review Table B-6, Section E, and Methods E.1, E.2, E.3, and E.4.

3. Review Section 2.0 of NUREG-1140.

4. Obtain a copy of Defense Nuclear Facilities Safety Board letter regarding red oil dated November 13, 2003, and review the safety measure to prevent red oil.

5. Obtain a copy of references on hydrofluoric acid and describe the precautions necessary to prevent a chemical hazard.

6. Review and describe the Interim Guidance on Inspector Duties/Responsibilities During Terrorist-Based Threats/Attacks at Region II Reactor and Fuel Facilities.

7. Meet with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness Inspector to discuss any questions you may have as a result of these activities. Discuss the answers to the questions listed under the Evaluation Criteria section of this study guide with your supervisor or the person designated as a resource.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item SG-EP-3

Fuel Facility Emergency Preparedness Inspector

On-the-Job Training Activities

Fuel Facility Emergency Preparedness Inspector On-the-Job Training

TOPIC: (OJT-EP-1) Emergency Drill/Exercise Evaluation

PURPOSE: Fuel facilities are required to conduct emergency exercises biennially. The biennial exercise is a full-scale test of the entire onsite emergency response organization and the offsite support organizations are invited to participate. The performance of a full-scale exercise using scenarios that are not known by exercise participants provides the licensee with an opportunity to assess the performance of the emergency organization to identify and correct areas of deficiencies. Areas of deficiencies may include personnel performance, equipment operability, and training. Upon completion of this on-the-job training (OJT), you should be able to evaluate the adequacy of a licensee's emergency response program and the effectiveness of the licensee to self-identify and resolve problems related to their emergency preparedness program.

COMPETENCY AREA: INSPECTION
TECHNICAL AREA EXPERTISE

LEVEL OF EFFORT: 50 hours

REFERENCES:

1. RG 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Material Facilities" (ML003739885)
2. NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Facility" (ML013380540)
3. 10 CFR Parts 70.22, 76.91, and 40.31
4. IP 88051, "Evaluation of Exercises and Drills"
5. Site Emergency Plan
6. IP 88050, "Emergency Preparedness"
7. Office of Investigation and Enforcement, Information Notice No. 89-46, "Confidentiality of Exercise Scenarios"
8. NRC Letter (Edward McAlpine) to all Fuel Facilities dated November 20, 1996, "Submittal of Exercise Objectives and Scenario Details"

EVALUATION CRITERIA: Upon completion of the tasks in this OJT, you should be able to:

1. Review a licensee's exercise scenario submittal package to determine if the scenario details would provide an adequate test of the Emergency Plan, Plan implementing procedures, and equipment.

2. Discuss the time-line requirements for exercise scenario submittal packages and how submittals should be submitted to the NRC.

3. Evaluate the performance of exercise participants in areas such as: emergency classification, offsite notifications, protective action recommendations (PARs), command and control, press release, and other areas as appropriate (see IP 88051 subsection 02.06).

4. Compare your independently identified performance concerns against the licensee's identified concerns to determine whether the licensee is critically assessing the response and self-identifying performance weaknesses and deficiencies, particularly with respect to the risk significant topics of emergency declaration, notification, and PARs.

5. Determine if the licensee's critique of exercise performance is effective in identifying exercise performance weaknesses and deficiencies, as well as concerns of lesser significance, for corrective action and prioritizing items for resolution.

6. Compare the biennial exercise scenario's narrative summary and time line to scenarios used previously by the licensee during quarterly drills, practice exercises, or the previous biennial exercise to determine if the scenario was unacceptable due to the NRC-graded exercise containing practice scenario details.

7. Identify trends in poor performance during an emergency drill/exercise that may represent failures to correct weaknesses and deficiencies identified during the time period beginning with the previous biennial exercise.

8. Determine if the licensee has demonstrated an adequate capability for providing reasonable assurance that on-site and off-site protective measures can be taken in the event of a radiological emergency, or if a recommendation to NRC management should be made that the licensee conduct a remedial drill.

TASKS:

1. Review IP 88051, “Evaluation of Exercises and Drills,” and IP 88050, “Emergency Preparedness,” to identify the inspection attributes provided for drill/exercise performance evaluations. Discuss any questions with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness Inspector.

2. Review licensee final exercise submittal package and become familiar with exercise objectives and the evaluation criteria for determining if objectives were met. Discuss any questions with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness Inspector.

3. Review the regulatory requirements with regard to an exercise contained within 10 CFR Parts 40.31, 70.22, and 76.91.

4. Coordinate with your supervisor or the lead inspector what area of the licensee’s performance you may observe during the exercise based on the type of accident that is postulated. Refer to IP 88051 subsection 02.06 for areas of consideration.

5. Based on the scenario details, become familiar with relevant portions of the licensee’s Emergency Plan and Plan Implementing Procedures which provide requirements for classification, notification, and PARs to determine if the appropriate actions are taken.

6. Review the exercise objectives and scenario details to determine if the postulated accident would provide an adequate test of the Plan. In the event you believe it is inadequate, notify your supervisor, the lead inspector and the licensee to discuss the appropriate actions associated with performing a remedial drill (refer to IP 88051 subsection 02.03). Identify opportunities for event recognition, classification, notification, and PAR development, and the licensee’s criteria for determining performance success versus failure.

7. In the event weaknesses were identified during the previous exercise, review the corrective actions taken by the licensee and identify performance areas for observation to determine the adequacy of the corrective actions in response to the weakness.

8. During the exercise, do not interfere with the exercise players. Do not “prompt” exercise players or voice your opinions of players’ performance during the exercise (see IP 88051 subsection 03). The NRC assessments and comments must

be held confidential until after the licensee's critique presentation to the inspectors.

9. Document examples (include the time) where licensee Controller or Evaluator observed prompting of exercise player(s) during the exercise. Refer to IP 88051 subsection 03.

10. Obtain copies of any checklists and forms used by the emergency response organization during exercise performance with regard to event classification, notification, dose projection, PARs, and press releases.

11. Obtain records of other observed areas in which you suspect corrective actions may be necessary. Identify if the weakness indicates a programmatic problem to the point that an emergency planning standard was not met.

12. Attend licensee evaluator meetings and critiques. Determine if the licensee's critique identified similar performance concerns as identified by the NRC. Pay particular attention to the characterization of response in areas such as event declaration, notification, PAR, corrective action failures, and other areas identified as needing improvements.

13. Verify that the licensee properly dispositions weaknesses with regards to the site's corrective action program.

14. Provide your observations and concerns to the lead inspector. Discuss your observations and provide a recommendation as to whether the licensee demonstrated the capability of providing reasonable assurance that adequate protective measures can be taken in the event of an emergency, or if a remedial exercise should be recommended to NRC management and the basis for the recommendation.

15. Meet with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness Inspector to discuss any questions that you may have as a result of these activities and to demonstrate that you can meet the evaluation criteria for this OJT.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item OJT-EP-1

Fuel Facility Emergency Preparedness Inspector On-the-Job Activity

TOPIC: (OJT-EP-2) Corrective Actions for Emergency Preparedness Weaknesses

PURPOSE: Fuel facilities are required to identify and correct weaknesses and deficiencies discovered during events and through their emergency drill and exercise program. Upon completion of this OJT, you should be able to evaluate the overall ability of a licensee to self-identify and resolve problems related to their emergency preparedness program.

COMPETENCY AREA: INSPECTION
TECHNICAL AREA EXPERTISE

LEVEL OF EFFORT: 24 hours

REFERENCES:

1. RG 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Material Facilities" (ML003739885)
2. NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Facility" (ML013380540)
3. 10 CFR Parts 70.22, 76.91, and 40.31
4. Emergency Plan Quality Assurance Audit
5. Site Emergency Plan
6. IP 88051, "Evaluation of Exercise and Drills"
7. IP 88050, "Emergency Preparedness"

EVALUATION CRITERIA: Upon completion of the tasks in this OJT, you should be able to:

1. Discuss emergency preparedness regulatory requirements for the identification and correction of deficiencies, weaknesses, and issues found during drill and event critiques.
2. Provide examples where a licensee failed to properly capture an item in its corrective action system.
3. Discuss a method(s) for verifying the adequacy of corrective actions.

4. Discuss with your supervisor or the person designated as a resource the overall effectiveness of a licensee's corrective actions as it relates to emergency preparedness following a review of corrective action documentation, interviews, and/or performance observation during an event, emergency drill, or exercise.

TASKS:

1. Review the following documents for expectations associated with correcting weaknesses and deficiencies from emergency drills and exercises:
   a. RG 3.67 Section 7.4
   b. NUREG-1520 Section 8.4.3.1.13
   c. 10 CFR 70.22 (i)(3)(xii)
   d. 10 CFR 76.91 (l)
   e. 10 CFR 40.31 (j)(3)(xii).

2. As determined by your supervisor or the person designated as a resource, perform the following tasks under the guidance of a qualified Fuel Facility Emergency Preparedness Inspector:

   a. Review the licensee's corrective action program to determine if emergency preparedness issues are being tracked for resolution. Review if emergency preparedness issues are prioritized according to importance.

   b. Obtain and review a copy of the exercise and/or drill critique items entered into the licensee's corrective action program since the previous inspection. Determine if the data indicates trends in areas such as event classification, notification, protective action recommendation, monitoring, and command and control. Discuss your conclusions with a qualified Fuel Facility Emergency Preparedness Inspector.

   c. If available, review documentation associated with an activation of the emergency response organization in response to an actual emergency classification. Determine if documentation was adequate to support independent conclusions concerning the following:
      1) Were the classification and offsite notifications performed correctly?
      2) Were there problems associated with Emergency Plan implementation during the event(s)?

      Determine if negative performance or program issues were identified and captured in the corrective action program. Discuss your conclusions with a qualified Fuel Facility Emergency Preparedness Inspector.

d. Review the most recent independent audit required by the Emergency Plan. Verify that performance or program issues identified in the audit were captured in the corrective action program.

e. Request for review the final report or critique comments from an emergency drill or actual event for the period(s) in which the emergency response facility was activated since the last inspection. If reviewing a drill or exercise, review the following details:
   1) Drill scenario.
   2) Participant and evaluator logs.
   3) Offsite notification forms.
   4) Dose projection worksheets.
   5) Environmental monitoring team sheets.
   6) Significant event logs.
   7) Post-drill critique notes and comment forms.

   Determine if all performance or program issues that were reviewed in the documentation were captured in the exercise report and the corrective action program. Discuss your conclusions with a qualified Fuel Facility Emergency Preparedness Inspector, the person designated as a resource or your supervisor.

f. During a site visit, select corrective actions associated with an emergency organization activation (drill or event) and obtain the detailed corrective action descriptions. As a guide for selection of corrective actions to review, consider items associated with emergency planning standards (e.g. emergency classification, notification, protective action recommendations). Verify the actions taken were adequate.

g. If available for review, observe the adequacy of corrective actions during a performance activity such as a drill or exercise. As an alternative, depending on the issue, a walkthrough with response personnel may be used in place of a drill or exercise. Obtain the description of the corrective action and verify the completion of each corrective action through direct observation.

3. Meet with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness Inspector to discuss any questions that you may have as a result of these activities and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item OJT-EP-2

Fuel Facility Emergency Preparedness Inspector On-the-Job Activity

TOPIC: (OJT-EP-3) Emergency Action Level and Emergency Plan Changes

PURPOSE: Licensee Emergency Plans provide a description of the personnel, facilities, activities, and methods used to respond to any site postulated emergency condition. Emergency Action Levels (EALs) provide entry criteria for classifying emergency conditions based on measurable and/or observable conditions. Standards for contents of Emergency Plans and EALs are found in NRC regulations and other guidance documents. In accordance with 10 CFR Parts 40.35(f), 70.32(i), and 76.91(o), licensees are allowed to make changes to their Emergency Plan and EALs without NRC prior approval if the changes do not decrease the effectiveness of the Plan. Upon completion of this on-the-job training (OJT), you will be able to determine whether licensee Emergency Plan changes are in accordance with the requirements in 10 CFR Parts 40 and 70.

COMPETENCY AREA: INSPECTION
TECHNICAL AREA EXPERTISE
REGULATORY FRAMEWORK

LEVEL OF EFFORT: 32 hours

REFERENCES:

1. RG 3.67, "Standard Format and Content for Emergency Plans for Fuel Cycle and Material Facilities" (ML003739885)
2. NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Facility" (ML01338054)
3. 10 CFR Parts 40.31, 70.22, and 76.91
4. EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (ML003769701)
5. Site Integrated Safety Analysis or Safety Analysis Report
6. Site Emergency Plan
7. Regulatory Information Summary (RIS) 2005-02, "Clarifying the Process for Making Plan Changes"
8. NUREG-1140, "A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees" (ML013380540)

9. Licensee procedures for evaluating and making changes to the Emergency Plan and emergency action levels, and for evaluating potential decreases of effectiveness of the Plan and implementing procedures.

EVALUATION CRITERIA:

Upon completion of the tasks in this OJT, you should be able to:

1. Describe the NRC process for an in-depth review of Emergency Action Level and Emergency Plan changes that have been submitted to the NRC

2. Describe what is meant by a "decrease in effectiveness" of the Emergency Plan, EALs, and/or Emergency Plan Implementing Procedures.

3. Describe the regulatory requirements for licensees to make and implement changes to their Emergency Plan and/or EALs.

4. Describe where to find the regulatory requirements for the contents of Emergency Plans and where to find regulatory guidance.

5. Review a submitted Emergency Plan change and determine whether the change requires an in-depth review.

6. Review a submitted Plan or EAL change to determine if the change results in a decrease in effectiveness of the Emergency Plan.

TASKS:

1. Review RIS 2005-02 to identify the attributes used to determine if a change to an Emergency Plan or EAL constitutes a decrease in effectiveness.

2. Become familiar with the content of the following guidance documents for the development of PARs in the event of Emergency Plan changes involving PARs:
   a. EPA 400-R-92-001, Chapters 1, 2, and 5
   b. NUREG-1140 "A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees"

3. If available, obtain and review one NRC inspection report detailing the inspection of changes to a licensee's EALs or Emergency Plan.

4. Meet with your supervisor, the person designated as a resource or a qualified Fuel Facility Emergency Preparedness

Inspector to discuss any questions that you may have as a result of these activities and demonstrate that you can meet the evaluation criteria listed above.

DOCUMENTATION: Fuel Facility Emergency Preparedness Inspector Proficiency Level Qualification Signature Card, Item OJT-EP-3

Fuel Facility Emergency Preparedness Inspector Technical Proficiency Level Signature Card and Certification

Inspector Name: _____	*Employee Initials / Date*	*Supervisor's Signature / Date*
A. *Training Courses*		
Fire Protection for Fuel Cycle Facilities (F-206S)		
Chemical Safety for Fuel Cycle Facilities		
B. *Study Guides*		
(SG-EP-1) Code of Federal Regulations for Emergency Preparedness Inspectors		
(SG-EP-2) Preparation and Evaluation of Radiological Emergency Plans		
(SG-EP-3) Manual of Protection Action Guides and Protective Actions for Nuclear Incidents		
C. *On-the-Job Activities*		
(OJT-EP-1) Emergency Drill/Exercise Evaluation		
(OJT-EP-2) Corrective Actions for Emergency Preparedness Weaknesses		
(OJT-EP-3) Emergency Action Level and Emergency Plan Changes		

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

Supervisor's Signature: _____ Date: _____

This signature card and certification must be accompanied by Form 1, Fuel Facility Emergency Preparedness Inspector Technical Proficiency Level Equivalency Justification, if applicable.

Copies: Inspector
HR Office
Supervisor

Form 1: Fuel Facility Emergency Preparedness Inspector Technical Proficiency-Level Equivalency Justification

*Inspector Name:*_____	*Identify equivalent training and experience for which the inspector is to be given credit.*
A. Training Courses	
Fire Protection for Fuel Cycle Facilities (F-206S)	
Chemical Safety for Fuel Cycle Facilities	
B. Study Guides	
(SG-EP-1) Code of Federal Regulations for Emergency Preparedness Inspectors	
(SG-EP-2) Preparation and Evaluation of Radiological Emergency Plans	
(SG-EP-3) Manual of Protection Action Guides and Protective Actions for Nuclear Incidents	
C. On-the-Job Activities	
(OJT-EP-1) Emergency Drill/Exercise Evaluation	
(OJT-EP-2) Corrective Actions for Emergency Preparedness Weaknesses	
(OJT-EP-3) Emergency Action Level and Emergency Plan Changes	

Supervisor's Recommendation: Signature / Date: _____

Division Director's Approval: Signature / Date: _____

Copies to: Inspector
HR Office
Supervisor

Attachment 1

Revision History for IMC 1247 Appendix C-3

Commitment Tracking Number	Issue Date	Description of Change	Training Needed	Training Completion Date	Comment 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	N/A	ML090400917