

**INSPECTION TECHNICAL PROCEDURE**

**I-106**

**PERSONNEL TRAINING AND QUALIFICATION ASSESSMENT**

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Revision 3

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# **INSPECTION TECHNICAL PROCEDURE I-106, REV. 3**

## **PERSONNEL TRAINING AND QUALIFICATION ASSESSMENT**

### **1.0 PURPOSE**

This procedure assists inspectors in verifying that the Contractor's training and qualification program complies with the Contractor's Quality Assurance Manual (QAM) and is implemented to ensure that important-to-safety functions are properly conducted.

### **2.0 OBJECTIVES**

This procedure assists inspectors in ensuring the following:

- The Contractor has a personnel training and qualification program that complies with the requirements of the QAM. This program should result in the Contractor's staff being adequately qualified and trained to perform assigned important-to-safety functions
- The training and qualification program is implemented in accordance with the Contractor's program and is effective in providing appropriately qualified and certified staff to accomplish the important-to-safety work described in the authorization basis.

Note: This procedure does not include guidance for the assessment of the radiological controls program (RCP) staff training and qualifications. Procedure ITP I-150, "RCP Training and Qualifications Assessment," will be used as guidance for assessing the RCP staff.

### **3.0 INSPECTION REQUIREMENTS**

#### **3.1 Staff Training**

- 3.1.1 The plan should address the training needed for initial proficiency, maintenance of proficiency, and changes in technology, methods, or job responsibilities. (QAM Policy Q-02.2, Section 3.2.3)
- 3.1.2 The inspector should verify indoctrination and training is commensurate with the scope, complexity, and importance of the activities, and the education, experience, and proficiency of the personnel. (QAM, Policy Q-02.2, Section 3.2.1)
- 3.1.3 The inspector should verify personnel performing or managing activities affecting quality receive indoctrination in their job responsibilities and authority; general criteria, including applicable codes and standards; company procedures; and quality assurance program requirements prior to performance of such work. (QAM, Policy Q-02.2, Section 3.2.2)

### **3.2 Staff Qualification**

- 3.2.1 The inspector should verify responsible organizations have designated those activities that require formal qualification of personnel and the minimum requirements for such personnel. (QAM, Policy Q-02.2, Section 3.3.1)
- 3.2.2 The inspector should verify the responsible organization has established written procedures for the formal qualification of personnel and for assurance that only those who meet the requirements are permitted to do the activity. (QAM, Policy Q-02.2, Section 3.3.2)
- 3.2.3 The inspector should verify qualification requirements for personnel performing NDE, inspection and tests to verify quality, and auditing, meet the special requirements for these positions. (QAM, Policy Q-02.2, Section 3.3.3 and Policy Q-02.3)

### **3.3 Continuing Education**

The inspector should verify continuing training includes the following, as applicable:

- Training in significant applicable procedure changes
- Applicable industry operating experience
- Selected fundamentals with emphasis on knowledge and skills necessary to assure safety
- Other training as needed to correct identified performance problems. (QAM, Policy Q-02.2, Section 3.4)

### **3.4 Specific Requirements for QARD Applications**

The inspector should verify the Contractor ensured the following was conducted for personnel who perform or manage design, scientific investigations, software development activities, and for personnel who verify or manage the verification of design, scientific investigation, software development activities:

- Descriptions are established for the positions these personnel occupy.
- Minimum education and experience requirements are established for each position commensurate with the scope, complexity, and nature of the work.
- Personnel have experience and education commensurate with the minimum requirements established. Documented justification is provided for persons who do not meet minimum education and experience requirements.
- Minimum education and experience are verified or, when minimum education and experience cannot be verified, documented justification is provided for the personnel assignment.

### **3.5 Effectiveness of Training and Qualification Programs**

The inspector should verify audits are performed to determine the effectiveness of the training program, and the frequency of audits is commensurate with the status and importance of work. (QAM, Policy Q-18.1, Sections 3.1.1 and 3.2.2)

### **3.6 Adequacy of Training Records**

The inspector should verify training records are established and maintained according to quality requirements. (QAM, Policy Q-17.1, Section 3)

## **4.0 INSPECTION GUIDANCE**

### **4.1 Staff Training**

4.1.1 The inspector should review the Contractor's training plan to ensure it addresses initial proficiency, maintenance of proficiency, and changes in technology, methods, or job responsibilities. The inspector should determine how the Contractor's training plan is translated into specific procedures and applied to different job situations within the different organizations which have training responsibilities for their personnel. The relationship of the training department and the responsible organizations should be determined.

4.1.2 The inspector should review the training plan and related procedures to understand the Contractor's actions for determining how personal education and experience is factored into the determination of the basic training requirements for a particular job. The inspector should also review through random checks of training records of personnel performing important-to-safety work that training was:

- Recorded as required
- Defined in subject and scope
- Presented by a qualified instructor
- Documented with attendees' names and the date presented.

The inspector should also attend training sessions (if available) to determine if the learning objectives of the training are being accomplished.

4.1.3 The inspector should discuss with management the programs that ensure personnel receive appropriate indoctrination before performing any activities affecting quality, and review any procedures which address this issue. This indoctrination must include specific job responsibilities and authority, general criteria including codes and standards, procedures, and quality assurance program requirements.

## **4.2 Staff Qualification**

- 4.2.1 The inspector should interview at least two managers--one each from design and construction areas, and review the manager's determination of activities that require formal qualification of personnel. The inspector should ensure that minimum requirements are identified for each position, and that both initial training and periodic retraining requirements are addressed.
- 4.2.2 The inspector should review procedures related to formal qualification requirements for the same organizations reviewed during inspection of Section 4.2.1 above. These procedures should address controls to ensure that appropriate training was completed prior to starting the job activity.
- 4.2.3 The inspector should randomly sample the training and qualification files of at least six individuals who perform NDE, or other quality examinations, tests, or audits. Determine if minimum education and experience levels stated in the policy/procedures are being followed. Specifically, ensure that qualifications meet all the specific requirements set forth in Section 3.3.3 of Policy Q-02.2 of the QAM. The inspector should ensure:
- Those individuals who perform NDE have current certificates which include identification of the specific activities, experience, previous training, capability demonstrations and test results (as required by job description), signature of the designated individuals responsible for certifications, certification dates, and dates of expiration
  - Those individuals who serve as auditors, lead auditors, and audit technical specialists meet the special requirements of QAM, Policy Q-02.3, Section 3.2, Section 3.3, and Section 3.4, respectively.

If examples are found where the minimum requirements outlined in the policy or procedures were not followed, determine if documentation exists to adequately justify the job assignments.

## **4.3 Continuing Education**

The inspector should select and review the training files for six individuals to confirm continuing training had been administered for the cases described in Section 3.3.

## **4.4 Specific Requirements for QARD Applications**

The inspector should ensure the items listed in Section 3.4 are included within the personnel training files for individuals who perform or manage specific project activities, or verify or manage the verification of those specific project activities listed in Section 3.4.

#### **4.5 Effectiveness of Training and Qualification Programs**

The inspector should review the last audit report of the training program, and any other surveillances or assessments of training activities. These may have been performed by the QA department or by the responsible organizations. The inspector should determine whether there were any findings, if such findings were provided to appropriate management, and if corrective actions were completed and documented.

#### **4.6 Adequacy of Training Records**

The inspector should determine how training records are developed and maintained. This may require a sampling of training records in at least two separate line organizations, and in the training department. The inspectors should randomly compare training and certification records of personnel performing important-to-safety work against the project records management system to determine if the system is being properly maintained. This includes comparing all forms of training such as on-the-job training, formal training, reading assignments, refresher courses, technical seminars and conferences, and self-study.

### **5.0 REFERENCES**

10 CFR 830, "Nuclear Safety Management Regulation," *Code of Federal Regulations*, as amended, Section 830, Subpart A, "Quality Assurance Requirements."

DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*, Rev. 2, U.S. Department of Energy, Office of River Protection, 2001.

*Integrated Safety Management Plan*, 24590-WTP-ISMP-ESH-01-001, Rev. 3, Bechtel National, Inc., Richland, Washington, 2003.

*Quality Assurance Manual*, 24590-WTP-QAM-QA-01-001, Rev. 4, Bechtel National, Inc., Richland, Washington, 2003.

RL/REG-98-26, *Inspection Technical Procedures*, U.S. Department of Energy, Office of River Protection, 2001.

ITP I-150, "RCP Training and Qualifications Assessment"

Attachments: None