October 13, 2004

ALL AGREEMENT STATES, MINNESOTA, PENNSYLVANIA,

DRAFT REVISION TO MANUAL CHAPTER 1246, SECTION 16, “TECHNICAL REVIEWER QUALIFICATIONS JOURNAL, BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS” (STP-04-077)

Enclosed for your review and comment is the draft revision to the U.S. Nuclear Regulatory Commission’s (NRC) Manual Chapter (MC) 1246, Section 16, Training Requirements for Sealed Source and Device Reviewers.” The NRC MC describes the process to be used for NRC staff to qualify as sealed source and device reviewers. Changes are noted in side bar format. We would appreciate receiving your comments within one month of receipt of this letter.

Thank you for your attention to this matter. If you have any questions regarding this correspondence, please contact me or the individual named below.

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TELEPHONE: (301) 415-7138  
FAX: (301) 415-5369

/RA/

Josephine M. Piccone, Deputy Director  
Office of State and Tribal Programs

Enclosure:  
As stated

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* This information request has been approved by OMB 3150-0029, expiration 06/30/07. The estimated burden per response to comply with this voluntary collection is approximately 8 hours. Send comments regarding the burden estimate to the Records and FOIA/Privacy Services Branch (T-5F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0029), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.
Section XVI: Training Requirements for Sealed Source and Device Reviewers

A. Applicability

The training described below is required for all materials license reviewers assigned to perform radiological safety reviews of sealed source and device applications.

B. Training

1. Required Initial Training
   a. Self Study and on-the job Training
      (1) NRC Orientation
      (2) Code of Federal Regulations
      (3) Office Instructions
      (4) Regulatory Guidance
      (5) NRC Management Directives
      (6) ADAMS
      (7) Agreement States Program and Interaction
      (8) Directed Review of Selected Licensing Case Work
   b. Core Training. These course establish minimum formal classroom training requirements. Refer to Section 1246-16 for exceptions to these requirements.
      (1) Basic Health Physics Technology Course (H-122)
      (2) Licensing & Inspection Course (G-108)
      (3) Licensing Practice & Procedures Course (G-109)
   c. Specialized Training. Additional courses may be required in order to gain knowledge necessary for specialized licensing activities. Management will make this determination on an individual basis.

END
SECTION XVI

TECHNICAL REVIEWER QUALIFICATIONS JOURNAL
BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS
SECTION XVI
TECHNICAL REVIEWER QUALIFICATIONS JOURNAL
BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS

Applicability

This NRC Technical Reviewer Qualification Journal implements NRC Manual Chapter 1246, Appendix A, Section XVI, by establishing the minimum training requirements for personnel assigned to perform technical evaluations of byproduct material sealed sources and devices applications submitted to the NRC or to an Agreement State.

The NRC Technical Reviewer Qualification Journal serves as a guideline for the development of a Qualification Journal, and establishes the minimum training requirements consistent with NRC Manual Chapter 1246. The Qualification Journal must provide traceable documentation to show that minimum requirements are met for each technical reviewer.

The NRC Technical Reviewer Qualification Journal consists of a series of qualification guides and qualification cards. Each qualification card is used to document task completion, as indicated by the appropriate signature blocks. The corresponding qualification guide establishes the minimum knowledge levels or areas of study that must be completed for each qualification card.

Most of the qualification guides are divided into sections. The review sections of the qualification guides will identify references with general application to the technical reviewer’s qualification. The technical reviewer should be expected to have a general familiarity with these references. Other sections of the qualification guides will identify specific references that have direct application to the review discipline. The technical reviewer should be expected to demonstrate detailed knowledge of these specific references.

In order to ensure that the safety evaluations conducted by the reviewer are technically correct and accurate, to promote consistency between like products reviewed, and to ensure that the public and the applicants are given consistent and accurate information regarding policy, regulations, rules and accepted practices associated with sealed source and device safety evaluations, the management will vest full signature authority only to those reviewers that are qualified to perform all areas of evaluation.

The potential reviewer’s immediate supervisor will assign appropriate submitted applications on a case by case basis. This discretionary approach is intended to provide the prospective reviewer’s management with the ability to tailor the qualification process to match the background, experience, qualifications and training levels of the reviewer. Limited signature authority may be granted by the management in specific areas to competent reviewers who do not have the required qualifications in all areas.
To complete your qualification as a Technical Reviewer of Sealed Sources and Devices you are to complete the enumerated qualification cards. All sign-offs shall include the original signature of the responsible reviewer and the date. Maintain these cards in a file along with any background or written material required by the program. This file will constitute the NRC Sealed Source and Device Technical Reviewers Qualifications Journal.

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<td>NRC Orientation</td>
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<td>3.</td>
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<td>Regulatory Guidance</td>
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<td>Agreement States Program and Interaction</td>
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<td>Directed Review of Selected Licensing Case Work</td>
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<td>First Line Supervisor</td>
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<td>9.</td>
<td>Formal Training</td>
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<td>First Line Supervisor</td>
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TECHNICAL REVIEWER QUALIFICATIONS JOURNAL
BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS

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<td>Recommended as qualified reviewer</td>
<td>Second Level Supervisor</td>
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<tr>
<td>or Board Chairman</td>
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<td>Qualification Board Acceptance</td>
<td>Second Level Supervisor</td>
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<td>Certification Memo issued</td>
<td>Second Level Supervisor</td>
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<td>granting signature authority</td>
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Qualification Card 1
NRC General Orientation

A. Site Orientation
   1. New employee processing package completed
      ___________________________________________
         Employee
   2. Facility tour and introduction
      ___________________________________________
         First Line Supervisor

B. NRC Organization
   1. Review of NRC headquarters and NMSS organization
      ___________________________________________
         Employee
   2. Discussion of NRC organization
      ___________________________________________
         First Line Supervisor
Qualification Card 2
Code of Federal Regulations

A. Familiarization with selected CFR parts completed

______________________________
Employee

B. Discussion completed on CFR parts related to radiation byproduct material applications in industry and medicine

______________________________
First Line Supervisor
TECHNICAL REVIEWER QUALIFICATIONS JOURNAL
BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS

Qualification Card 3
Office Instructions

<table>
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<tr>
<th>A. Familiarization with office policies and procedures</th>
<th>Initials</th>
<th>Date</th>
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Employee

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<tr>
<th>B. Discussion completed on office policies and procedures</th>
<th>Initials</th>
<th>Date</th>
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______________________________
First Line Supervisor
A. Regulatory review completed

1. Regulatory Guides

   ____________________________
   ____________________________
   Employee

2. Information Notices

   ____________________________
   ____________________________
   Employee

3. NUREGs

   ____________________________
   ____________________________
   Employee

4. Inspection Manual Chapters

   ____________________________
   ____________________________
   Employee

5. Industry Codes and Standards

   ____________________________
   ____________________________
   Employee

6. Sealed Source and Device Registry

   ____________________________
   ____________________________
   Employee

7. Review and discuss with Management Memorandum of Understanding regarding the general concepts and elements of MOU NRC has signed with other Agencies (i.e. FDA, DOL, DOE, DOT, FBI, etc.)

   ____________________________
   ____________________________
   Employee

__________________________
First Line Supervisor
A. Review of selected portions of the NRC Management Directives completed

___________________________________________________________
Employee

B. Discussion of the application of the NRC Management Directives to the Sealed Source & Device program

___________________________________________________________
First line supervisor
A. Review of selected portions of the ADAMS User’s Manual and system access completed

B. Familiarization with ADAMS station(s) and operation

__________________________
Employee
Qualification Card 7
Agreement States Program and Interaction

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A. Overall coordinating role of STP

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Employee

B. STP General Policies and procedures

__________________________
Employee

__________________________
First Line Supervisor
A. Expected Cases to be reviewed.

The reviewer is expected to review a variety of cases as outlined below. The reviewer should have participated in the full review, from start to the issuance of the certificate, and developed deficiency questions as necessary. The cases will be assigned and selected by the team leader or supervisor to represent the following:

Sources: 4
Irradiators: 1
Radiography: 1
Consumer Products: 6
Gauges: 6
Medical Devices: 2

If new cases are not available, at the discretion of the team leader or supervisor, the reviewer may review previously concluded cases. The cases will be selected by the team leader or supervisor.

This is a flexible requirement and can be modified to reflect the available applications and staff workload.

Initial Date

Required Case work Completed:

______________________________
Employee

______________________________
First Line Supervisor
## A. Mandatory

1. **Basic Health Physics Technology (H-122)**  
   Reviewers classified as Series 1306 are exempt from this requirement.

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<th>Initials</th>
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   _________________  
   Employee

   _________________  
   First Line Supervisor

2. **Licensing & Inspection (G-108)**

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   Employee

   _________________  
   First Line Supervisor

3. **Licensing Practice & Procedures (G-109)**

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   Employee

   _________________  
   First Line Supervisor

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**Note:** Course selection depends on previous health physics training and on the experience of the reviewer.

## B. Elective Technical Courses

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<th>Initial</th>
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1. **Safety Aspects of Industrial Radiography (H-305)**

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<th>Initials</th>
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2. **Irradiator Technology (H-315)**

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3. **Transportation of Radioactive Materials (H-308)**

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4. **Safety Aspects of Well Logging (H-314)**

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5. **Human Error Analysis/ Human Reliability Analysis for NMSS (P-406)**

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6. **Root Cause/Incident Investigation Workshop (G-205)**

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<td>Public Outreach Meetings</td>
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<td>8</td>
<td>Media Training Workshop</td>
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<td>9</td>
<td>Q/A &amp; QC Processes (external)</td>
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<td>10</td>
<td>Materials &amp; Failure Analysis (external)</td>
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<td>11</td>
<td>Welding Technology and Codes (external)</td>
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<tr>
<td>12</td>
<td>NDE: PT, MT, UT, Eddy Current, Fiber Optics, Microscopy, Electron Scanning Microscopy etc. (external)</td>
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TECHNICAL REVIEWER QUALIFICATIONS JOURNAL  
BYPRODUCT MATERIAL SEALED SOURCE AND DEVICE REVIEWERS

Qualification Guide 1  
NRC Orientation

A. NRC Orientation

1. The qualifying individual should read and complete appropriate following forms for processing into the NRC systems:
   a. Personnel information
   b. Health insurance elections
   c. Retirement plan elections
   d. Savings elections (e.g. U.S. Savings Bonds, TSP, etc.)
   e. Fitness for Duty requirements and physical examination
   f. Any other forms which may be required by NRC Office of Human Resources
   g. Payroll forms and time and labor reporting
   h. Regulatory Information Tracking System (RITS)

2. The First Line Supervisor should orient the qualifying individual to the facility as follows:
   a. tour the facility and introduce the qualifying individual to the staff
   b. indicate to the qualifying individual the location of controlled documents, reference material, supplies, office equipment, etc.

B. NRC Organization

1. The qualifying individual should review and become familiar with:
   a. Organizational charts of division, NMSS, regions and headquarters and overall NRC organization (NUREG 0325)
   b. Role of Headquarters in policy and interpretation of regulations
   c. Role of NRC General Counsel
   d. Role of NRC Inspector General
   e. Role of NRC Public Affairs
   f. Role of NRC Office of Investigations
   g. Role of NRC Office of Enforcement
   h. Physical location of NRC offices and regions
   i. Role of NRC as a regulatory agency
      (1) 10 CFR Part 1 (Organization)
      (2) Atomic Energy Act of 1954, as amended
      (3) Energy Reorganization Act of 1974, as amended
      (4) NRC Enforcement Policy (NUREG-1600)
      (5) Incident Response Plan (NUREGs 0728 and 0845)

2. The First Line Supervisor should discuss NRC organization and role with the qualifying individual to ensure the qualifying individual has a full understanding of NRC's organization and mission and the role of a Sealed Source and Device Technical Reviewer in the risk informed performance based mission.
A. A selection of currently applicable CFR Parts should be made by the First Line Supervisor. The selection should include the references listed below and be documented. The qualifying individual should be expected to have a general knowledge of the topics addressed in the references. This review may be accomplished by self-study, study-quizzes, or discussions.

1. 10 CFR Part 1 Statement of organization and general information
2. 10 CFR Part 2 Rules of practice for domestic licensing proceedings and issuance of orders
3. 10 CFR Part 9 Public records
4. 10 CFR Part 19 Notices, instructions and reports to workers: inspection and investigations
5. 10 CFR Part 20 Standards for protection against radiation
6. 10 CFR Part 21 Reporting of defects and noncompliance
7. 10 CFR Part 25 Access authorization for licensee personnel
8. 10 CFR Part 26 Fitness for duty programs
9. 10 CFR Part 30 Rules of general applicability to domestic licensing of byproduct material
10. 10 CFR Part 31 General domestic licenses for byproduct material
11. 10 CFR Part 32 Specific domestic licenses to manufacture or transfer certain items containing byproduct material
12. 10 CFR Part 33 Specific domestic licenses of broad scope for byproduct material
13. 10 CFR Part 34 Licenses for radiography and radiation safety requirements for radiographic operations
14. 10 CFR Part 35 Medical use of byproduct material
15. 10 CFR Part 36 Licenses and radiation safety requirements for irradiators
16. 10 CFR Part 39 Licenses and radiation safety requirements for well logging
17. 10 CFR Part 71 Packaging and transportation of radioactive material
18. 10 CFR Part 150.20 Reciprocity
19. 10 CFR Part 170.31 Application Fees
20. 10 CFR Part 171.16 Annual Fees

B. Following completion of the qualifying individual's self study of the listed CFR Parts, a discussion will be held with the qualifying reviewer by the First Line Supervisor to test the qualifying reviewer's knowledge of these Parts. To the extent possible, recent application of various sections, new regulatory initiatives, and current industry issues should be emphasized.
A. Office/Division Policies and Procedures

1. Read the Office/Division Policy and Procedures Manual

2. The qualifying individual should review the Office/Division policies and practices on:
   
   a. Travel, including Management Directive 14.1 Official Temporary Duty Travel

   b. Telephone use


   d. Work schedule, including Management Directive 10.42, Hours of Work and Premium Pay

   e. Use of government equipment including computers (ADAMS) and Management Directive 13.1 Property Management

   f. Union activities, including Management Directive 10.102, Labor-Management Relations Program for Federal Employees

   g. Communications outside NRC

   h. Policies on outside employment and acceptance of gifts

   i. Participation in political activities

   j. Routing of mail and procedures for sending mail and materials (via U.S. Mail, Federal Express, etc.), including Management Directive 3.23, Mail Management

   k. Ordering of documents (e.g. NUREGs)

   l. NMSS emergency and evacuation procedures

   m. Employee appraisal system and Individual Development Plan (IDP)
      (1) Employee trial period (Management Directive 10.14 Employment and Staffing)
      (2) Employee appraisals (Management Directive 10.67, Non-SES Performance Appraisal System)

B. The First Line Supervisor should discuss these policies and practices with the qualifying individual to ensure that the qualifying individual has a full and complete understanding.
Qualification Guide 4
Regulatory Guidance

A. A selection of currently applicable regulatory guidance should be identified by the First Line Supervisor. These references should include those listed below and should be documented. The qualifying individual should be expected to have a general knowledge of the topics addressed in the references. The review may be accomplished by self-study, study-quizzes, briefings, or discussions.

1. Regulatory Guides (use latest revisions)
   
   6.1 Leak Testing Radioactive Brachytherapy Sources
   
   6.9 Establishing Quality Assurance Programs for the Manufacture and Distribution of Sealed Sources and Devices Containing Byproduct Material
   
   8.29 Instruction Concerning Risks from Occupational Radiation Exposure
   
   Others as selected by the First Line Supervisor

2. Information Notices
   
   IN 94-89 Equipment Failures at Irradiator Facilities
   
   IN 95-44 Ensuring Compatible Use of Drive Cables Incorporating Use of Industrial Nuclear Company Ball - Type Male Connectors
   
   IN 96-04 Incident Reporting Requirements for Radiography Licensees
   
   IN 96-20 Demonstration of Associated Equipment Operability
   
   IN 96-51 Residual Contamination Remaining in Krypton-85 Handling System after Venting
   
   IN 96-52 Cracked Insertion Rods On Troxler Model 3400 Series Portable Moisture Density Gauges
   
   IN 96-53 Retrofit to Amersham 660 Posilock Radiography Camera to Correct Inconsistency in 10 CFR Part 34 Compatibility
   
   IN 96-54 Vulnerability of Stainless Steel to Corrosion When Sensitized.
   
   IN 97-89 Distribution of Sources and Devices Without Authorization
   
   IN 98-09 Collapse of an ISOCAM II, Dual-Headed Nuclear Medicine Gamma Camera
IN 99-23  Safety Concerns Related to Repeated Control Unit Failures of the Nucletron Classic Model High-Dose-Rate Remote Afterloading Brachytherapy Devices

IN 99-27  Malfunction of Source Retraction Mechanism in Cobalt-60 Teletherapy Treatment Units

Others as selected by the First Line Supervisor

3. NUREG Reports

NUREG-0325  USNRC Functional Organizational Chart

NUREG-0403  High Temperature Testing of Smoke Detector Sources

NUREG-1175  Environmental Assessment of Consumer Products Containing Radioactive Material

NUREG-1480  Loss of an Iridium-192 Source and Therapy Misadministration at Indiana Regional Cancer Center

NUREG-1556  Consolidated Guidance About Materials Licenses Vols. 1 to 20

NUREG-1600  General Statement of Policy and Procedure for NRC Enforcement Actions

NUREG-1631  Source Disconnects Resulting From Radiography Drive Cable Failures

NUREG-1717  Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials

NUREG/CR-4357  The Feasibility of Detecting the Import of Unauthorized Radioactive Materials in to the USA

NUREG/CR-5881  An examination of Source Material Requirements Contained in 10 CFR 40

NUREG/CR-6074  Investigation of Failed Radioactive Stainless Steel Troxler Gauges Vol.5

NUREG/CR-6642  Safety Testing of Industrial Radiography Devices

Others as selected by the First Line Supervisor
4. Inspection Manual Chapters

INSPECTIONS

IMC 0300 Announced and Unannounced Inspections
IMC 0303 Item Reporting
IMC 2800 Materials Inspection Program

INTERACTIONS WITH OTHER FEDERAL AGENCIES

IMC 1007 Interfacing Activities Between Regional Offices of NRC and OSHA

INCIDENT RESPONSE

IMC 1300 Incident Response Actions - Responsibility and Authority
IMC 1301 Response to Radioactive Material Incidents That Do Not Require Activation of the NRC Incident Response Plan
IMC 1302 Action Levels for Radiation Exposures and Contamination Associated With Materials Events Involving Members of the Public
IMC 1330 Response to Transportation Accidents Involving Radioactive Materials
IMC 1360 Use of Physician and Scientific Consultants in the Medical Consultant Program

Others as selected by the First Line Supervisor

5. Industrial Codes and Standards

ANSI N42.16 Gamma Radiography- Specification for Design and Testing of Apparatus
ANSI N42.17A Performance Specifications for Health Physics
ANSI N43.2 Radiation Safety for X-Ray Diffraction and Fluorescence Analysis Equipment
ANSI N43.3 Installations Using Non-Medical and Sealed Gamma-Ray Sources, Energies Up to 10 MEV
ANSI N43.4 Classification of Radioactive Self-Luminous Light Sources
ANSI N43.6 Sealed Radioactive Source- Classification (ISO 2919)
ANSI N43.7  Safe Design and Use of Self-Contained Dry Sources Storage Gamma Irradiators (Category I)

ANSI N43.8  Classification of Industrial Ionizing Radiation Gauging Devices (ISO 7205)

ANSI N43.9  For Gamma Radiography- Specifications for Design and Testing Apparatus

ANSI N43.10  Safe Design and Use of Panoramic, Wet Source Storage Gamma Irradiators (Category IV) and Dry Source Storage Gamma Irradiators (Category II)

ANSI N43.15  Safe Design and Use of Self-Contained Wet Sources Storage Gamma Irradiators (Category III)

ANSI N44.1  Integrity and Test Specifications for Selected Brachytherapy sources

ANSI N44.2  Leak-Testing Radioactive Brachytherapy Sources

ANSI N449.1  Procedures for Periodic Inspection of Cobalt and Cesium-137 Teletherapy Equipment

ANSI N537  Radiological Safety Standards for Design of Radiographic and Fluoroscopic Industrial X-Rays Equipment

ANSI/ISO/QSC- Q9001-2000  Quality management systems - Requirements

ISO 7205  Radionuclide Gauges - Gauges designed for permanent installation

Others as selected by the First Line Supervisor

6. Sealed Source and Device Registry

7. The First Line Supervisor will discuss with the reviewer as minimum the general concepts and elements of MOU NRC has signed with other Agencies (i.e. FDA, DOL, DOE, DOT, FBI, etc.) That impact the registration or disposal of radiological sources and devices. Review and discuss the following with Management:

1. FDA  Sealed Source and Device Applications requiring notification and/or 510K approved form

2. DOE  DOE Technical and Contractual Interfaces and TAPM Qualifications Requirements

3. DOT  The First Line Supervisor will discuss with the reviewer the DOT Technical Regulatory Interfaces

Others as selected by the First Line Supervisor
B. The application of these guidance documents to the Sealed Source and Device review program should be studied in detail by the qualifying individual and covered by the First Line Supervisor in discussions, interviews, or oral quizzes.

A. A selection of currently applicable NRC Management Directive (MD) references should be identified by the First Line Supervisor. These references should include those listed below and be documented. The qualifying reviewer should be expected to have a general knowledge of the topics addressed in the references. This review may be
accomplished by self-study, study-quizzes, briefings, or discussions. The selection should include:

1. NRC MD 3.1 Freedom of Information Act
2. NRC MD 3.2 Privacy Act
3. NRC MD 8.3 NRC Incident Investigation Program
4. NRC MD 8.8 Management of Allegations
5. NRC MD 9.1 Organization Management
6. NRC MD 9.29 Regional Offices
7. NRC MD 10.42 Hours of Work and Premium Pay
8. NRC MD 10.43 Time and Attendance Reporting
9. NRC MD 10.67 Non-SES Performance Appraisal System
10. NRC MD 10.101 Employee Grievances
11. NRC MD 10.130 OSHA
12. NRC MD 10.131 Standards for Protection Against Ionizing Radiation
13. NRC MD 10.159 Differing Professional Views or Opinions
14. NRC MD 14.1 Official Temporary Duty Travel

Others as selected by the First Line Supervisor

Qualification Guide 6
ADAMS

A. The use and training for ADAMS will consist of a PDC course in using ADAMS; review of ADAMS USER GUIDE; and knowledge of capturing and retrieving ADAMS documents.
A. The First Line Supervisor will discuss with the reviewer in training the role of the Office of State and Tribal Programs (STP) as the office responsible for establishing and maintaining effective communications and working relationship between the NRC and the Agreement States. STP:

1. Serves as the primary contact for policy matters between NRC and the Agreement States;
2. Keeps the Agreement States informed on NRC activities;
3. Keeps the Agency appraised of the Agreement States’ activities as they may affect NRC and conveys to NRC management the Agreement States’ views toward NRC policies, plans, and activities; and
4. Administers the Agreement State Program.

B. A selection of currently applicable STP references should be identified by the First Line Supervisor. These references should include those listed below. The qualifying individual should be expected to have a general knowledge of the topics addressed in the references. The review may be accomplished by self-study, study-quizzes, briefings, or discussions. The selection should include:

1. NRC MD 5.6 Integrated Materials Performance Evaluation Program (IMPEP)
2. NRC MD 5.7 Technical Assistance to Agreement States
3. NRC MD 9.15 Organizations and Functions, Office of State Programs
4. STP SA-100 Implementation of the Integrated Materials Performance Evaluation Program (IMPEP)
5. STP SA-108 Non-Common Performance Indicator - Sealed Source & Device (SS&D) Reviews
6. STP Internet Homepage www.hsrdr.ornl.gov

C. STP encourages direct staff level interaction between the NRC and the above listed external groups.
A. Compile an Attachment in the following Format for all the case work completed

1. Type of Byproduct:
2. Applicant:
3. Type of Device or Source:
4. Status:
5. Date Completed:
6. Reviewer:
7. Total of products reviewed:
A. The standards for each Training Course are provided in the NRC Technical Training Center Course Catalog and will not be duplicated in the Qualification Guide.