

(SP-98-093, November 1998, Program, Procedure SA-103)  
DATED: NOVEMBER 23, 1998

SIGNED BY: PAUL H. LOHAUS

ALL AGREEMENT STATES  
MINNESOTA, OHIO, OKLAHOMA, PENNSYLVANIA, AND WISCONSIN

TRANSMITTAL OF STATE AGREEMENTS PROGRAM INFORMATION (SP-98-093)

Your attention is invited to the enclosed correspondence which contains:

INCIDENT AND EVENT INFORMATION.....

PROGRAM MANAGEMENT INFORMATION... **XX DRAFT OSP PROCEDURE SA-103,  
"REVIEWING COMMON  
PERFORMANCE INDICATOR #3,  
TECHNICAL STAFFING AND  
TRAINING"**

TRAINING COURSE INFORMATION.....

TECHNICAL INFORMATION.....

OTHER INFORMATION.....

Supplementary information: Enclosed for your review and comment is the draft OSP Procedure SA-103, Reviewing Common Performance Indicator #3, Technical Staffing and Training." The document has been drafted to incorporate procedures and guidance for the review conducted under the Integrated Materials Performance Evaluation Program. We would appreciate receiving your comments within one month of receipt of this document.

This information request has been approved by OMB 3150-0029, expiration 04/30/01. The estimated burden per response to comply with this voluntary collection request is 6 hour(s). Forward any comments regarding the burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0029), Office of Management and Budget, Washington, DC 20503. If a document 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, a collection of information.

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Paul H. Lohaus, Deputy Director  
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Enclosure:  
As stated



## OSP Procedure Approval

### *Reviewing Common Performance Indicator #3 Technical Staffing and Training - SA-103*

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Issue Date:

Expiration Date:

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Richard L. Bangart  
*Director, OSP*

*Date:*

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Paul H. Lohaus  
*Deputy Director, OSP*

*Date:*

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Lance J. Rakovan  
*Procedure Contact, OSP*

*Date:*

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#### **NOTE**

*The OSP Director's Secretary is responsible for the maintenance of this master copy document as part of the OSP Procedure Manual. Any changes to the procedure will be the responsibility of the OSP Procedure Contact. Copies of OSP procedures will be distributed for information.*



**Procedure Title:**  
***Reviewing Common Performance Indicator  
#3, Technical Staffing and Training***  
**Procedure Number: SA-103**

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**Issue Date:**

## **I. INTRODUCTION**

This document describes the procedure for conducting reviews of NRC Regional Offices and Agreement States using Common Performance Indicator #3, Technical Staffing and Training [NRC Management Directive 5.6, *Integrated Materials Performance Evaluation Program* (IMPEP), November 25, 1997].

## **II. OBJECTIVES**

- A. To confirm that a well-conceived and balanced staffing strategy has been implemented by the NRC Regional Office or Agreement State throughout the review period.
- B. To verify that qualification criteria for hiring new technical staff are established and are being followed.
- C. To ensure that any vacancies, especially at the senior-level positions, are filled in a timely manner.
- D. To confirm that there is a balance in staffing the licensing and inspection programs.
- E. To determine that management is committed to training and staff qualification.
- F. To verify that license reviewers and inspectors are trained and qualified in a reasonable period of time.
- G. To evaluate the Region or Agreement State materials program personnel training and qualification program since the last IMPEP review. For NRC, these requirements are established in NRC Inspection Manual Chapter (IMC) 1246. Agreement States should have established, documented training and qualification requirements that are equivalent to IMC 1246 or the NRC/Organization of Agreement States (OAS) Training Working Group Recommendations for Agreement State Training Programs.

### **III. BACKGROUND**

- A. With respect to staffing, this procedure applies only to technical and management personnel in the nuclear materials safety program. This primarily refers to byproduct, source, and special nuclear materials (non-reactor) inspections.
- B. This procedure specifically excludes personnel involved only with non-Atomic Energy Act licensees.

### **IV. ROLES AND RESPONSIBILITIES**

- A. Selection of a Principal Reviewer.

The team leader for the Regional or State review will determine which team member(s) is assigned lead review responsibility for this performance indicator.

The principal reviewer for this indicator is responsible for determining:

1. whether the FTEs budgeted for the radioactive materials program are sufficient to complete the required work;
2. whether vacancies are filled promptly;
3. if not, whether program performance has been adversely affected;
4. whether changes in workload lead to changes in staffing; and
5. whether those individuals performing materials licensing and inspection activities are adequately qualified and trained to perform their duties.

### **V. GUIDANCE**

- A. Prior Information

For the Regions, the budget authorization can be obtained prior to the Regional visit from NMSS' Program Management, Policy Development, and Analysis Staff. Similar information will need to be obtained directly from the States through the questionnaire. Staffing and training records as well as organizational charts, as appropriate, should be reviewed based on Regional or State questionnaire responses

prior to the review, so that issues can be identified and questions formulated prior to the on-site portion of the review.

**B. Review Details**

The principal reviewer should refer to Part III, *Evaluation Criteria*, of Management Directive 5.6, *Integrated Materials Performance Evaluation Program*, for specific evaluation criteria. The principal reviewer should evaluate and document the following:

1. Adequacy of FTE dedicated to the materials program for properly implementing the regulatory program, including the number and type of full-time and part-time positions allocated to the program.
2. Impact of any positions that are currently unfilled, or which were unfilled for a significant amount of time during the review period.
3. Timeliness and effectiveness of the Region's or State's actions to adjust workloads, or to recruit or reassign personnel to fill vacancies.
4. Probable cause and impact of any observed differences between authorized staffing and budget, as well as any impacts likely to occur due to recent changes in approved staffing levels or workload.
5. The proper balance among FTE assigned to licensing, inspection, and incident response exists.
6. Minimum documented training and qualification requirements for personnel in the program as well as how personnel stand relative to those requirements.
7. Identification of available quality training courses used by an Agreement State that could be attended by NRC personnel and reduce NRC training costs. By including the identification of such training courses in the annual "good practices" letter, this information will be shared with other Agreement States and NRC for their consideration in program planning.

8. Any deficiencies, or potential shortcomings in NRC or State training courses (content or availability) even though these findings may not be appropriate for inclusion in the assessment against this performance indicator.
9. The assessment should analyze any trends or developments over the entire period since the last review, not merely those present at the time of the review.
10. Examine the membership and statutory responsibilities for State radiation oversight boards and the boards' actions during the review period for the potential for conflict of interest.

**VI. APPENDICES**

Not Applicable

**VII. REFERENCES**

The reviewer should have available the following material:

- A. NRC Management Directive 5.6, Integrated Materials Performance Evaluation Program, November 25, 1997.
- B. Inspection Manual Chapter 1246, "Formal Qualification Programs in the Nuclear Material Safety and Safeguards Program Area."
- C. NRC/OAS Training Working Group Recommendations for Agreement State Training Programs.