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1. PURPOSE

This Management Control Procedure (MCP) establishes the requirements for the training, qualification, and certification of personnel assigned to the TMI-2, Fort St. Vrain (FSV), or Idaho Spent Fuel Facility (ISFF) Independent Spent Fuel Storage Installations (ISFSIs).

2. SCOPE

This procedure applies to contractor positions listed in Step 9.1 of the TMI-2 ISFSI, FSV ISFSI, and ISFF SARs, and to contractor ISFSI Management support positions. This procedure provides specific instructions for the implementation of the NRC licensed ISFSI and ISFF training programs. Contractor training procedures in Manual 12 – Training and Qualification may be used as necessary to demonstrate compliance with the ISFSI and ISFF training program requirements (refer to PDD-8).

The records storage requirements of MCP-557, Records Management for records generated directly or by reference by this procedure supersedes records storage requirements of MCP-85, Training Records Administration.

3. RESPONSIBILITIES/PREREQUISITES

Performer	Responsibilities
Manager ISFSI Management	Ensure that training requirements are specified for personnel assigned to and supporting the ISFSIs and ISFF. Approve NRC licensed facility lesson plans.
ISFSI Manager, ISFF Manager, or designees	Ensure that training requirements are specified for personnel assigned to and supporting the respective facilities. Approve facility specific lesson plans. Ensure indoctrination and training is completed prior to personnel performing work at the respective facilities.
Training Coordinator	Administer the ISFSI and ISFF training programs and maintain up-to-date records on the status of contractor trained personnel, training of new employees, and refresher or upgrade training of present personnel.

4. INSTRUCTIONS

4.1 Developing Minimum Training Requirements

4.1.1 Training Coordinator (or designee): Perform the following:

- 4.1.1.1 Develop minimum training requirements for ISFSI Management job functions based on information obtained from analyses. Include topics on general criteria, including the QARD, applicable codes, regulations, and standards as they relate to a particular position.
- 4.1.1.2 Update minimum training requirements as necessary to reflect changes in requirements or job functions as necessary.

4.1.2 Manager ISFSI Management/ISFSI Manager/ISFF Manager (or designee): Perform the following:

- 4.1.2.1 Approve minimum training requirements.
- 4.1.2.2 Assign or remove NRC licensed facility job codes to personnel as applicable.
- 4.1.2.3 Ensure personnel are indoctrinated and trained, as needed, to achieve initial proficiency; maintain proficiency; and adapt to changes in technology, methods, or job responsibilities.
- 4.1.2.4 Ensure personnel are indoctrinated in the following topics as they relate to a particular function:
 - A. General criteria, including the QARD, applicable codes, regulations, and standards.
 - B. Applicable implementing documents.
 - C. Job responsibilities and authority.

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4.1.3 Training Coordinator: Perform the following:

4.1.3.1 Enter or update training requirements into applicable ISFSI Management job codes in TRAIN.

NOTE: *Entering or updating training courses for job functions in TRAIN will automatically update the ITP for personnel assigned to the affected ISFSI Management job function. Additional training courses beyond the minimum required may be added to job positions to allow field supervisors to track site or task specific requirements, however, only the minimum requirements listed in the applicable ISFSI and ISFF SAR training programs are required for certification or qualification.*

4.1.3.2 Maintain list of approved training requirements.

4.2 Evaluating Training

4.2.1 Manager ISFSI Management (or designee): Ensure that the ISFSI Management training program is evaluated at least once biennially in order to determine the effectiveness of the training program and to identify actions to increase the program's effectiveness. Ensure this evaluation includes the FSV ISFSI, TMI-2 ISFSI, and ISFF training design plans.

4.2.2 Training Coordinator (or designee): Perform the following:

4.2.2.1 Ensure that the ISFSI and ISFF task-to-training matrices are validated at least once biennially in order to maintain the task lists current.

4.2.2.2 Validate ISFSI and ISFF two-year continuing training plans annually to ensure the training identified as "over-train" items are adequately addressed and meet the requirements of the ISFSI and ISFF SARs.

4.3 Waiving Training Requirements

NOTE 1: *Successful completion of equivalent training programs may be used as a basis for waiver from academic training requirements. This training should be comparable in content, performance criteria, and duration. Any information used in the evaluation for a waiver should be verified and documented. Previous work experience may be used as a basis for waiver from OJT requirements.*

NOTE 2: *The terms Waiver and Exception are synonymous.*

4.3.1 Apply the following prerequisites to Waiving Training Requirements:

4.3.1.1 Challenge examinations (test out) must not be considered a waiver to training requirements.

4.3.1.2 Although an individual may be waived from areas of the training program, in all cases the requisite examinations for qualification or certification must be completed. Applicable medical evaluations must also be completed.

4.3.1.3 The evaluation criteria for initial certification of CFHs and Operators must not be waived; nor must the evaluation criterion be waived for two or greater consecutive re-certification cycles.

4.3.2 Individual's Immediate Supervisor (or designee): Complete Part I of Form 361.04, Request for an Exception from Training, and submit to the Training Coordinator (or designee) with copies of any supporting documents.

4.3.3 Training Coordinator (or designee): Perform the following:

4.3.3.1 Review the request for appropriateness.

4.3.3.2 Recommend approval or disapproval (Part II) and forward the request to the applicable ISFSI or ISFF manager.

4.3.4 Applicable ISFSI or ISFF Manager (or designee): Approve or disapprove the request (Part III) and forward the request to the Training Coordinator.

4.3.5 Training Coordinator (or designee): Perform the following:

4.3.5.1 Update the individual's TRAIN record.

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- 4.3.5.2 File the request, along with any supporting documents, in the individual's training file.

NOTE: *This step applies to personnel who are involved in developing, reviewing and approving, administering, and grading written examinations for qualification and certification.*

4.4 Exempting Examination Requirements

- 4.4.1 Apply the following prerequisites to Exempting Examination Requirements:

4.4.1.1 Personnel who are involved in the developing, reviewing and approving, administering, and grading written examinations for qualification and certification are exempted from taking the examinations to maintain their own qualification or certification, due to their involvement with the examination process.

4.4.1.2 An individual who writes or reviews CFH or Operator examinations is exempted from taking the examinations for a period not to exceed one year from writing or reviewing examinations. However, a person who writes or reviews a CFH or Operator examination used for biennial continuing training is exempted from taking that examination until the exam is required again in the next training cycle.

- 4.4.2 Training Coordinator (or designee): Perform the following:

4.4.2.1 Identify individuals who should be exempted from the written examination requirements for a specific qualification or certification and complete Part I of Form 361.05, Request for an Exemption from Written Examination.

4.4.2.2 Forward the request to the applicable ISFSI or ISFF manager.

- 4.4.3 ISFSI and ISFF Manager (or designee): Perform the following:

4.4.3.1 Approve or disapprove the request.

4.4.3.2 Forward the request to the Training Coordinator.

- 4.4.4 Training Coordinator (or designee): File request in the individual's training file.

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4.5 Extensions for Certification or Qualification

NOTE: *Part IV of Form 361.03 (Approval of Applicable Department of Energy, Idaho Operations Office (DOE-ID) Facility Manager) is not applicable to NRC licensed facility extensions.*

- 4.5.1 Apply the following prerequisites to Extensions for Certification or Qualification:
 - 4.5.1.1 A 25% extension is allowed for NRC licensed facility training requirements. However, the extension should not be granted out of convenience.
 - 4.5.1.2 Requests for an extension must be submitted and approved prior to the anniversary date.
 - 4.5.1.3 If the individual does not complete the qualification or certification requirements within the approved extension time period, the qualification or certification must lapse.
- 4.5.2 Training Coordinator (or designee): Perform the following:
 - 4.5.2.1 Complete Part I of Form 361.03, Request for Certification/Qualification Extension.
 - 4.5.2.2 Forward the request to the applicable ISFSI or ISFF Manager.
- 4.5.3 ISFSI or ISFF Manager (or designee): Perform the following:
 - 4.5.3.1 Approve or disapprove the request (Part II).
 - 4.5.3.2 Forward the request to the Training Coordinator.
- 4.5.4 Training Coordinator (or designee): Perform the following:
 - 4.5.4.1 If the extension is approved, update the employee's expiration date in TRAIN.
 - 4.5.4.1.1 Do not change the anniversary date for a facility qualification or certification (for example, if a requalification date of January 20, 2001, is extended to February 28, 2001, the new requalification date for a biennial qualification would be January 20, 2003).

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4.5.4.2 File the request in the individual's training file.

4.6 Training Endorsements

NOTE: *A training endorsement is a one-time endorsement by ISFSI Management line-management used to document qualification or competency in a specific area. It does not permanently substitute for the formal training and qualification process. It may be used to document qualification in areas during training program transitions, or when severe time constraints do not allow for the completion of the formal qualification code development, review, and approval process.*

4.6.1 Training Coordinator (or designee): Perform the following:

4.6.1.1 Provide statement for area(s) of qualification or competency on endorsement form.

4.6.1.2 Document applicable personnel by name, S number, initial qualification date, current qualification date, and expiration date.

4.6.1.2.1 Expiration date must not exceed the normal biennial (two year) time for qualification.

NOTE: *Initial qualification date is the date the individual initially completed applicable requirements. Current qualification date is the most recent date the individual completed applicable requirements.*

4.6.1.3 Describe justification for personnel qualification or competency.

4.6.1.4 Attach any documentation which supports justification (such as TRAIN reports, letters of training completion, and so forth.)

4.6.2 Manager ISFSI Management/ISFSI Manager/ISFF Manager (or designee): Approve endorsement form.

4.6.3 Training Coordinator: Perform the following:

4.6.3.1 File approved endorsement in applicable training record.

4.6.3.2 Implement formal qualification program for applicable endorsements.

4.7 Certifying ISFSI Management Organization Personnel

NOTE: *Certification is the process by which the ISFSI Management provides written endorsement of the satisfactory achievement of qualification of a person for a position.*

- 4.7.1 Apply the following prerequisites to Certifying ISFSI Management Organization Personnel:
 - 4.7.1.1 Certification as a TMI-2 ISFSI Operator, ISFF Operator, or FSV ISFSI CFH is contingent on obtaining a score of greater than or equal to 80% on all academic examinations and satisfactory performance of all OJT practical examinations. A score of less than 80% on the examinations will require retesting. A score of less than 80% on the retest will constitute cause for dismissal from the certified position training program.
 - 4.7.1.2 Failure to demonstrate satisfactory performance of the OJT practical examinations will require retesting. Failure to demonstrate satisfactory performance of a second OJT practical examination will constitute cause for dismissal from the certified position training program.
 - 4.7.1.3 A score of less than 80% on any three initial academic examinations will constitute cause for dismissal from the certified position training program.
 - 4.7.1.4 The physical condition and general health of certified personnel will be verified by physical examination before initial certification and biennially thereafter.
 - 4.7.1.5 Refer to PDD-8 for other contractor position training and qualification requirements.
- 4.7.2 Individual Candidate: Complete training associated with assigned job positions.
- 4.7.3 Training Coordinator (or designee): Perform the following:
 - 4.7.3.1 Verify the individual has completed minimum training requirements, including any applicable medical examination, required for certification.
 - 4.7.3.2 Forward any supporting documentation to applicable ISFSI or ISFF Manager for certification endorsement.

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4.7.4 ISFSI and ISFF Manager (or designee): Perform the following:

4.7.4.1 Approve or disapprove certification endorsement.

4.7.4.2 Forward supporting documentation to Training Coordinator.

4.7.5 Training Coordinator (or designee): Perform the following:

4.7.5.1 If endorsement is approved, update individual's TRAIN record for certification completion.

4.7.5.2 File certification documentation in individual's training file.

4.7.5.3 If endorsement is not approved, determine further actions with applicable ISFSI or ISFF Manager.

4.8 Ensuring Personnel are Certified or Qualified Prior to Performing Work

4.8.1 Manager ISFSI Management/ISFSI Manager/ISFF Manager/Shift Supervisor/ Facility Safety Officer: Perform the following:

4.8.1.1 Ensure only CFH and Operator certified personnel perform and directly supervise fuel handling and transfers.

4.8.1.2 Ensure only certified personnel operate equipment and controls that have been identified as important to safety in the SAR for the applicable facility. An exception is for uncertified personnel undergoing On-the-Job training acting under the direct observation of certified personnel.

4.8.1.3 Ensure only qualified individuals are allowed to operate equipment, machinery, and cranes. An exception is for uncertified personnel undergoing On-the-Job training acting under the direct observation of qualified personnel.

4.8.1.4 Ensure instructors designated to teach the CFH or Operator certification program possess a current CFH or Operator certification or sufficient subject matter expertise for a particular subject or topic.

4.9 Continuing Training

4.9.1 Training Coordinator (or designee): Perform the following:

4.9.1.1 Establish a continuing training program based on both a fixed and flexible component.

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- 4.9.1.2 Present training as needed in order to convey pertinent modifications, procedure changes, regulatory changes, or other significant material in a timely manner.
- 4.9.1.3 Annually conduct ISFSI or ISFF GET composed of topics covered in initial GET.
- 4.9.1.4 Repeat operational training identified in respective CFH or Operator training programs biennially.
 - 4.9.1.4.1 Ensure classroom material and written examinations associated with operational training will be presented and completed prior to the operational training.
- 4.9.1.5 Present “pre-train” items prior to actually performing the task(s).

4.10 Maintaining Certification

NOTE: *This section will be expanded to accommodate the ISFF required certifications at a later date.*

- 4.10.1 Manager ISFSI Management: Perform the following:
 - 4.10.1.1 Actively maintain certified fuel handlers as necessary for the life of the FSV ISFSI.
 - 4.10.1.2 Maintain qualified personnel for HSM and DSC monitoring activities during extended storage periods at the TMI-2 ISFSI.
 - 4.10.1.3 Ensure that personnel who do not complete requalification requirements by the end of the training cycle and have not received an approved extension are not allowed to perform duties independently that require qualification/certification until requalification requirements are met.
 - 4.10.1.4 Provide for the direct supervision of personnel not currently certified or qualified when they are performing tasks requiring certification or qualification by an appropriately certified or qualified individual.

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4.10.2 Individual: Complete the requalification/recertification requirements as defined for assigned job position(s) within the period specified for GET and CFH training (however a grace period of 25% is allowed for extenuating circumstances which would prevent completion prior to the end of the applicable training cycle).

4.10.2.1 If the retraining requirements are not completed within the specified frequency, the initial training course must be completed in order to have qualification reinstated.

4.10.3 Instructor: Maintain qualification by instructing classes, and administering or grading examinations and OJT guides, and preparing, reviewing, or revising CFH instructional material.

4.10.4 Training Coordinator: Perform the following:

4.10.4.1 Update individual's recertification or requalification completion in TRAIN.

4.10.4.2 If an individual's recertification or requalification completion was not within the specified frequency, determine further (remedial) actions with applicable ISFSI Manager.

4.11 Training and Certification/Qualification Records

NOTE: *This section will be expanded to accommodate the ISFF required certification/qualification records at a later date.*

NOTE: *Medical examination records are maintained by the Occupational Medicine Program (OMP). If needed, medical examinations results can be obtained from the OMP office.*

4.11.1 Training Coordinator: Ensure medical examinations for applicable positions are completed as required.

4.11.2 Training Coordinator: Insert the following records into individual training files:

4.11.2.1 The completed training and certification/qualification records (such as written examinations, performance demonstration checklists, etc.) specified for personnel qualification requirements in Section 9.1.3 of the ISFF training program and 9.1.4 of the FSV and TMI-2 training programs.

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5. RECORDS

NOTE: *The Records Schedule Matrix, located on the intranet at http://edms.inel.gov/docs/matrix/mtx_menu.html, and the applicable facility, organization, program, or project records management plan and record types list provide current information on uniform file codes, disposition authorities, and retention periods for these records.*

- 5.1 The contractor must maintain all training materials, both academic lesson plans and On-the-job training (OJT) guides, developed in accordance with the ISFSI and ISFF training programs.
- 5.2 Records of the results of each certified operator's biennial medical examination and records of the completed records of certification will be maintained by OMP for five years.

6. DEFINITIONS

Qualification. Is defined in terms of education, experience, training, examination, and any special requirements necessary for performance of assigned responsibilities.

Certification. Is defined as the process by which line management endorses and documents, in writing, the satisfactory achievement of qualification of a person for a position.

7. REFERENCES

Manual 12 - Training and Qualification

MCP-557, Records Management, current revision

MCP-85, Training Records Administration, current revision

PDD-8, ISFSI Management Training and Administration Support, current revision

8. APPENDIXES

Appendix A, Procedure Basis

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Appendix A

Procedure Basis

Step	Basis	Source	Citation
Entire Document	Written procedures must be established, implemented, and maintained for Essential Program Control (QA, REMP, Training)	FSV TS TMI TS	5.4.1.0 5.4.1.P
Entire Document	Written procedures must be established, implemented, and maintained for administrative controls.	TS	5.4.1.a
3	Ensure indoctrination and training are completed prior to performing the work.	QARD	2.2.12.A.4
3	The Training Supervisor/Manager is responsible for the administration of the training program and to maintain up-to-date records on the status of contractor trained personnel, training of new employees, and refresher or upgrade training of present personnel.	SAR	9.3.1
3	The ISFSI/ISFF Manager is responsible for ensuring that training requirements are specified for personnel assigned to support the facility. In this role the ISFSI/ISFF Manager or designee will approve all specific lesson plans.	SAR	9.3.1
4.1	Determine required indoctrination and training.	QARD	2.2.12.A.1
4.1	Ensure personnel are indoctrinated and trained, as needed, to achieve initial proficiency; maintain proficiency; and adapt to changes in technology, methods, or job responsibilities.	QARD	2.2.12.A.2
4.1	Ensure personnel are indoctrinated in the following topics as they relate to a particular function: 1. General criteria, including the QARD, applicable codes, regulations, and standards. 2. Applicable implementing documents. 3. Job responsibilities and authority.	QARD	2.2.12.A.5

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Step	Basis	Source	Citation
4.2	Evaluate and assess the need for additional indoctrination and training as assignments, positions, or implementing documents change	QARD	2.2.12.A.3
4.2	The contractor must provide for and document the evaluation of training programs in order to ensure the continued improvement of training material and the conduct of training.	SAR	9.3.5
4.3	Applications for waivers of training requirements must be approved by the ISFSI Manager. Successful completion of equivalent training programs may be used as a basis for waiver from academic training requirements. This training should be comparable in content, performance criteria, and duration. Any information used in the evaluation for a waiver should be verified. Previous work experience may be used as a basis for waiver from OJT requirements.	FSV SAR TMI-2 SAR	9.3.6
4.3	The evaluation criterion for initial certification shall not be waived; nor shall the evaluation criterion be waived for two or greater consecutive recertification cycles.	FSV SAR TMI-2 SAR	9.3.9
4.5, 4.10	Training requirements must be completed within the period specified in the sections below for General Employee Training and Certified Operator Training; within a grace period of 25%. Not completing the retraining requirements within the specified frequency will require completion of the initial training course in order to have qualification reinstated.	FSV SAR TMI-2 SAR	9.3.7
4.11	One of the minimum qualifications for the position of Certified Fuel Handlers or ISFSI Operator is successful completion of the biennial medical examination.	FSV SAR TMI-2 SAR ISFF SAR	9.1.4 9.1.4 9.1.3
4.8	Personnel who operate or supervise the operation of equipment identified as important to safety in the Safety Analysis Report shall be trained and certified under the NRC approved training program.	FSV TS TMI-2 TS	5.3.1

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Step	Basis	Source	Citation
4.8	ISFSI equipment and controls identified as important to safety must be operated only by trained and certified personnel or those under the direct visual supervision of certified personnel.	FSV SAR TMI-2 SAR ISFF SAR	9.3.9 9.3.9 9.3.8
5	Maintain records of the results of each certified operator's biennial medical examination for five years.	SAR	9.3.2.a
5	Maintain records of the completed records of certification for five years.	SAR	9.3.2.b
5	The contractor shall maintain all training materials, both academic lesson plans and On-the-job training (OJT) guides, developed in accordance with this program.	SAR	9.3.4