



Institute of
Nuclear Power
Operations

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April 9, 1985

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear *Bill* Mr. Dircks:

Enclosed are two copies of the revised Coordination Plan for NRC/INPO Training-Related Activities (Appendix Four to the Memorandum of Agreement). The proposed changes are as follows:

- o Revised Section 2.b on page 1.
- o Deleted existing Attachments 2 and 3.
- o Added a new Attachment 2 as discussed previously with your staff to make the coordination plan consistent with the Commission's Policy Statement on Training and Qualification of Nuclear Power Plant Personnel.

I have signed the enclosed copies. If you agree with the revision, please sign, date, and return a copy.

Sincerely,

Zack
Zack T. Pate
President

ZTP/dcm
Enclosures (stated above)

cc/wo: J. H. Snizek
T. J. Sullivan

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APPENDIX NUMBER FOUR
COORDINATION PLAN
FOR
NRC/INPO TRAINING-RELATED ACTIVITIES

1. Background

The purpose of this plan is to coordinate selected NRC and INPO activities related to nuclear power industry training. It is also intended to provide a mechanism and a basis for information sharing and NRC recognition of INPO efforts in this area.

There are several underlying assumptions:

- o INPO and NRC share the goal of improving and maintaining the quality of nuclear utility training.
- o INPO recognizes the NRC's regulatory responsibilities.
- o Coordination of NRC and INPO training-related activities and sharing of information will increase overall effectiveness as well as lessen the burden imposed on the industry by duplication of activities.

2. Overall Coordination

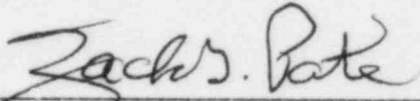
In order to promote overall coordination of NRC and INPO training-related activities, the following actions will be taken:

- a. NRC/INPO Human Factors Coordination Meetings will continue to be held on approximately a quarterly basis with representatives from NRC's Division of Human Factors Safety (NRR), Human Factors Branch (RES-DFO), and INPO's Training and Education Division. At these meetings, ongoing projects and plans will be discussed. Opportunities to contribute to each other's projects will be identified. Written reports of progress and results will be exchanged.
- b. An INPO observer will be invited to attend the programmatic review meeting of the Human Factors Review Group.

c. Coordination in specific areas is covered by attachments as follows:

- (1) Job and Task Analysis - Attachment 1 (Revision 1)
- (2) Accreditation of Training Programs - Attachment 2

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JOB AND TASK ANALYSIS

Both NRC and INPO analyze (and/or contract for the analysis of) nuclear power plant jobs and tasks for the purpose of defining training and qualification requirements, developing licensed operator examinations, improving operating procedures, recommending staffing levels, and evaluating control room human factors considerations. It is recognized that the NRC, INPO, and nuclear utilities would benefit from coordination and sharing of data. It is agreed that the following actions will be taken:

1. The NRC and NRC contractors will collect job and task analysis data in such a manner that it can be incorporated into the INPO computerized data base. NRC will provide this data to INPO in machine readable form on tape.
2. INPO will provide the NRC and, with INPO approval on a limited, case-by-case basis, NRC designated National Laboratories with access to the job/task analysis data stored in the INPO computer system. INPO approval for National Lab access will be in writing from the Vice President and Director, Training and Education Division. This will include data collected by the NRC and INPO. Access to this data will be via terminals located at the NRC and the NRC-designated laboratories, but will be limited to "read only" access. TYMNET costs will be borne by NRC and its contractors will be limited to 30 hours per week during the time period 8:00 a.m. and 5:00 p.m. E.D.T. or E.S.T. Outside of those hours it is not considered necessary to specify limits at the present time.
3. NRC and INPO-approved NRC-designated National Laboratories may use the INPO job/task analysis for the following purposes:
 - a) evaluation of human engineering designs of new control rooms and retrofitting current control rooms
 - b) identification of skill and knowledge requirements of plant personnel
 - c) evaluation of operator qualification and plant personnel training requirements
 - d) development of test questions for operator examinations
 - e) evaluation of normal, off-normal, and emergency operating procedures
 - f) assessment of job performance aids
 - g) evaluation of internal communication methods and systems

4. NRC will make available to INPO the job/task analysis data tapes containing the results of the NRC control room crew task analysis performed in 1982-83, additional data which may be collected by the NRC for control room crew task analysis, and other data which may be collected for other crafts and technicians associated with nuclear plant maintenance and operation.
5. Unless agreed otherwise, the data collected by INPO and the data collected by the NRC will be kept separated. Every effort will be made by both parties to protect the confidentiality of the data, the names of the nuclear power plants, and the personnel contributing to the data base, and to protect that information covered by the Privacy Act of 1974 (P.L. 93-579).

ACCREDITATION OF TRAINING PROGRAMS

1. Background

The purpose of this plan is to provide for coordination of selected INPO and NRC activities related to the implementation and accreditation of performance-based training programs. This plan also provides for continued industry initiative with NRC monitoring in this area and serves as a basis for NRC recognition of INPO's efforts. This coordination plan is consistent with the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel.

There are several underlying assumptions, including the following:

- o INPO recognizes NRC's regulatory responsibility.
- o NRC recognizes the industry's initiative and commitment to INPO programs that promote high quality training through development of integrated training and qualification systems, including accreditation of key training programs.
- o NRC and INPO recognize the need for a period of orderly progress in training activities as utilities implement training improvements, including performance-based training programs and continued additions of training staff, facilities, and simulators.
- o NRC recognizes INPO accreditation and associated training evaluation activities (see also Appendix 2, "Coordination Plan for NRC/INPO Appraisal and Evaluation Activities") as an acceptable means of self-improvement in training. Such recognition encourages industry initiative and reduces duplicate program review and appraisal activities.
- o INPO recognizes that the NRC requires access to selected INPO documents and information, as well as the opportunity to observe selected INPO activities related to training and accreditation, in order to ensure that the NRC meets its obligations to the public and the Congress.

2. INPO Activities

This section outlines current and planned INPO activities related to training and qualification of nuclear power plant personnel and accreditation of performance-based training programs. The INPO point of coordination for the implementation of this Attachment is the Vice President and Director, Training and Education Division.

- a. INPO will continue to manage the accreditation of utility training programs including:
 - o self-evaluations by member utilities, with assistance from the INPO staff;
 - o on-site evaluations of training and qualification programs by teams of INPO and utility personnel;
 - o preparation of a report for each accreditation evaluation;
 - o follow-up on recommendations developed during the accreditation process, including follow-up as part of the regular plant evaluation program;
 - o awarding (or deferring) of accreditation by the Accrediting Board;
 - o submittal to INPO by member utilities of two-year interim status reports on accredited programs; and
 - o re-accreditation of utility training programs covered by INPO accreditation approximately every four years.
- b. INPO will continue to conduct periodic performance-oriented evaluations of training and qualification programs as part of its regular plant evaluations.
- c. INPO will develop a Training System Development Manual and accreditation program description and accreditation criteria, and will provide copies of these documents to the NRC. These documents will be made publicly available.
- d. INPO will review and consider NRC recommendations regarding INPO-managed training-related programs, documents, and criteria.
- e. INPO will provide periodic detailed briefings on accreditation to appropriate NRC management personnel, including review of the activities described in 2.a above and documentation of the status of industrywide progress toward accreditation.
- f. INPO intends to brief the Commission periodically on program status.

3. NRC Activities

This section outlines the NRC's continuing efforts to monitor INPO activities as part of NRC's assessment of the effectiveness of industry's training and qualification program improvements. The NRC point of coordination for implementation of this Attachment is the Director, Division of Human Factors Safety.

- a. NRC will not issue documents that duplicate INPO training documents and will not refer to INPO documents as a means of satisfying NRC requirements so as to avoid "codifying" or the appearance of "codifying" INPO documents.
- b. NRC will assess the effectiveness of industry's training and qualification program improvements as follows:
 - o conduct operator licensing exams;
 - o conduct operator requalification exams, consistent with Commission policy;
 - o include a training summary evaluation as part of each systematic assessment report of licensee performance (SALP);
 - o monitor plant and industry trends and events involving personnel errors;
 - o continue evaluation of industrywide training and qualification program effectiveness; and
 - o conduct performance-oriented training inspections to assess the level of knowledge and qualifications of plant personnel.
- c. NRC will monitor INPO activities in training and accreditation as follows:
 - o receive periodic briefings and/or reports from INPO and review a sample of applicable INPO documents;
 - o recommend an individual who is not on the NRC staff to serve as a member on each Accrediting Board with full voting privileges;
 - o have an NRC staff member attend and observe Accrediting Board meetings with the INPO staff and/or the utility representatives;

- o on request and with concurrence of the utility, have NRC employees observe INPO accreditation team site visits for the purpose of monitoring the effectiveness of the accreditation process. Since accreditation teams are relatively small in number, it is anticipated that NRC would typically send only one observer on any visit. However, in certain circumstances, it may be appropriate to send more than one. INPO will obtain the necessary concurrence from the host utility. While specifying a maximum number to be observed is not considered necessary by either party, it is anticipated that NRC employees would observe approximately 20 percent of INPO accreditation team visits.
 - o accompany INPO on selected plant evaluations (see Appendix 2).
- d. NRC will provide INPO an opportunity to review and comment on NRC's performance-oriented inspection program, including applicable inspection guidelines. NRC will review and consider INPO's comments.
- e. NRC will coordinate any team inspections with INPO accreditation team visits and evaluations so as to minimize the impact on the utility involved. On request and with concurrence of the utility, an INPO employee may occasionally observe an NRC inspection in this area.
- f. Since INPO has its own system for obtaining member corrective action, NRC's role in pursuing corrective action of INPO-identified training and qualification recommendations will involve only significant safety problems for which NRC has no other reasonable alternative in meeting its legislated responsibilities. The NRC intends to exercise discretion in enforcement matters related to training as described in the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel.

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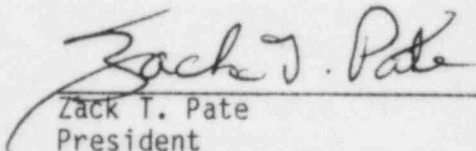
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