July 10, 2017

Efficiency Bulletin: 17-15

Standardization of the Systematic Approach to Training

Implement a Systematic Approach to Training (SAT) process that is standardized and streamlined and will improve instructor productivity by reducing administrative burden.

Addressees: Chief nuclear officers and NEI APCs and INPO APCs

Issue: TRN-1.1, Standardization of the Systematic Approach to Training

Summary of Efficiency Opportunity

- Desired end-state—A uniform, simplified and graded approach to the implementation of SAT.

- Value proposition (vision of excellence)—Reduce the administrative burden on training and line resources with implementing SAT activities.

- Why is it important?—Over time, administrative requirements and complexity have been incorporated into site processes for executing SAT, thereby creating an approach that far exceeds the requirements for compliance with the training rule as described in 10 CFR 55.4 and 10 CFR 50.120.

- Industry benchmark value(s)—The total number of person-hours used in implementing the SAT process are reduced without effecting the quality and rigor in executing the five phases of training: Analysis, Design, Development, Implementation and Evaluation (ADDE).

- Measure of effectiveness—Effective implementation of the standardized process as evident through assessment activities.

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Relevant Standards

- ACAD 85-006s, Principles of Training System Development Supplement
- ACAD 02-001, The Objectives and Criteria for Accreditation of Training in the Nuclear Power Industry

Relevant Regulatory Requirements

- 10 CFR 55.4, Systems Approach to Training
- 10 CFR 50.120, Training and Qualification of Nuclear Power Plant Personnel

Background

A group of industry training professionals reviewed the industry’s overall approach to executing the Systematic Approach to Training. The group reviewed processes from each fleet and alliance, ACAD documents, and regulatory documents with the vision of a standardized SAT process. The group concluded that fleets/sites have independently developed their own processes and have built in margin over and above the regulations based on internal and external operating experience. For example, the Difficulty-Importance-Frequency analyses are not consistent among fleets or sites. Different point scales are used and most existing processes do not tie continuing training decisions to appropriate frequencies for delivering the material. This is resulting in the inefficient use of training resources by potentially training on the same or similar topics too frequently. Another example is the inconsistent format for conducting training needs analyses that is resulting in broad threshold variations for determining training needs. To address these SAT inconsistencies, the training professionals have developed a standardized process document to improve alignment and efficiency throughout the industry.

Guidance

All fleets/sites are to implement in total the standardized process that will simplify tasks and reduce administrative burden. The following is a list of highlights from the standardized procedure:

- One streamlined, industry-standard process for five phases of SAT. This will eliminate having five different processes for the ADDIE process.
- Standardized forms to document completion of specific activities within each SAT phase, such as needs analysis and design activities. This eliminates the inconsistencies in the industry and simplifies the analysis process to better focus on the specific training need.
- A standardized approach to conducting Difficulty-Importance-Frequency analysis that ties continuing training decisions to periodicities. This provides the sites the ability to tie continuing training decisions to a periodicity.
- Streamline the process for conducting a task analysis.
- A simple form that flows from needs analysis, to selection of learning objectives, to setting, and finally an evaluation and/or effectiveness method. This reduces using three different forms down to one form.
- Performance analysis is an input into training needs analysis. This reduces the burden of training owning line performance analysis.
- Equivalent qualification, in addition to just training exemptions.

Key to Color Codes:

Red: NSIAC initiative – full participation required for viability
Blue: Action expected at all sites, but is not needed for broad industry viability
Green: Utility discretion to implement, consistent with its business environment
Standardized Just-In-Time Training template that is quick and easy and does not require full-scale lesson plan development. This streamlines the design and development of just-in-time training and provides more flexibility.

The conduct of management observations of training and self-assessments, although part of the evaluation phase of SAT, are not addressed in the training system development process procedure. These items are to be covered by a site-specific process.

A governance and oversight methodology has been established. The deciding body for approving revisions to the process will be the corporate training director peer group. The SAT working group will remain intact as an SAT steering committee and will screen all proposed revisions that come from their respective sites and will present to the corporate training directors for review. The standardized process is hosted on the INPO member website.

**Change Management Considerations**

**Industry Activities**
- Industry webinar to provide background for initiative, INPO discussion, and an open forum to clarify expectations and ask questions. Webinar information can be found at the following site: [https://web.inpo.org/Pages/Nuclear-Promise-Issues.aspx](https://web.inpo.org/Pages/Nuclear-Promise-Issues.aspx).

**Company Actions**
- Review corrective action documents (CAPR) and evaluate for any conflicts. Conflicts may include former corrective actions to prevent recurrence, corrective actions from causal analyses or any escalation/elevation actions. Follow station/fleet processes to resolve these conflicts.
- Gap present process to standardized process.
- Review and determine what forms or instructions are still needed, for example attendance records or forms.
- Create job aids based on review of instructions or forms.
- Download standardized process and enter into document management system.
- Conduct gap training for instructional staff and other applicable personnel as needed.
- Review site-specific instructor certification/qualification programs and make necessary revisions.
- Develop a communication plan or briefing package for site leadership team and affected personnel.
- Establish a method for SAT steering committee members to evaluate proposed revisions to standardized process and presenting to governance body.
- If performance analysis process resides in a training process, move into performance improvement or corrective action program process.

**Guiderails**
- Conduct an assessment six to 12 months after implementation to verify training activities continue to meet the requirements of the relevant training standards referenced above. The assessment may be scheduled to coincide with existing training self-assessments such as a mid-cycle comprehensive assessment.

**Report Your Site’s Results**

Please report your company’s implementation of this improvement opportunity, including the date of completion. Send this information along with your company point of contact to EfficiencyBulletin@NEI.org.
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