

Oct. 27, 2016

## Efficiency Bulletin: 16–26b Standardization of In-Processing Training

Standardize training for utility and supplemental workers to access any U.S. nuclear facility and reduce the frequency of refresher training.

**Addressees: Chief nuclear officers, NEI APCs and INPO APCs**

**Issue: TRN-5.5, Standardization of In-Processing Training**

### Summary of Efficiency Opportunity

- Desired end-state—The industry uses standard nuclear plant access training modules for utility and supplemental workers, and refresher training is performed at reduced frequencies.
- Value proposition (vision of excellence)—Reduce the total duration and requirements of training for supplemental and utility employees and, ultimately, the cost to train and process workers.
- Why it is important?—This will reduce redundant and unnecessary training that personnel currently complete to obtain and maintain a badge. Note: This effort will not change the badge technology used at each site, and access will require a site-specific badge.
- Industry benchmark value(s)—It should take fewer days to badge a supplemental employee.
- Measure of effectiveness—The average number of days required to badge for in-processing of supplemental employees should decline.
- Maximum benefit is obtained when this efficiency opportunity is implemented in conjunction with efficiency bulletins EB 16-26a, "Standardizing Nuclear Access Processing and Requirements"; EB 16-26c, "Implement Common NANTeL Radiation Worker Training"; and EB 16-26d, "Supplemental Supplier Contracts/Use of NANTeL and EPRI STEs."

Color Code: Red  
Due: January 2017

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## Relevant Standards

- NEI 03-04, Guidelines for Plant Access and Other Standardized Shared Training Courses and Evaluations
- ACAD 00-007, Guidelines for Radiation Worker and Radiological Respiratory Protection Training
- Performance Objectives and Criteria (INPO) IS.1
- Performance Objectives and Criteria (INPO) NP.1
- American Nuclear Insurers Engineering Inspection Criteria for Nuclear Liability Insurance Section 2.0, General Employee Training

## Guidance

The goal of this initiative is to reduce the redundant and unnecessary training that personnel currently complete to obtain and maintain a badge at a nuclear facility. This does not apply to specific qualifications that may be required for a worker to perform work, such as clearance and tagging training. Each site should use its change management process to address the changes brought forward by this initiative. Items to consider are included later in this document. The following changes to in-processing training have been established by this initiative:

- Each utility is required to use the NANTeL system as the primary tool for completing the standardized training.
- Each site should have a business continuity strategy in the event NANTeL becomes unavailable. As NANTeL will be viewed as the industry training tool, PADS will be the database where completed standardized training certifications will be stored. Each site should have the capability to place all completed training into the PADS database and update certifications in NANTeL. In the event that training must be conducted in a manner other than NANTeL, the material used shall match the NANTeL material.
- The topics standardized for this initiative are contained in Attachment 1.
- The standardized training courses are common to all sites; however, there may be some state and local requirements that must be evaluated and information provided to employees. This does not imply that formal training and evaluation is required; however, the necessary analysis of requirements must be performed to determine the delivery method for the information.
- Sites shall review their radiation worker practical exercise against the objectives in ACAD 00-007 and revise as applicable.
- Training frequencies have been evaluated using a systematic approach and have resulted in a decrease in the required frequencies for refresher training. Frequencies for the standardized training courses are referenced in attachment 1; all utilities shall adhere to the listed frequencies.
- Personnel who are out of the industry for three years or greater must retake all of the standardized training modules.
- An analysis determined that the hard-hat-ready topics (Attachment 1) do not represent tasks, but

### 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

instead are training activities. As a result, sites should remove any qualifications associated with the hard-hat-ready topics and store them as training records.

- An important aspect of standardized training is that some workers may not require training in all topics. Each site will need to analyze the skill sets of personnel and assign only those training topics necessary for performing assigned duties. For example, a supplemental engineer may only require FFD/BOP, PAT, Cyber Security, Electrical Safety for Non-Qualified Worker, FME and the Human Performance Module.
- Governance and oversight shall be provided by the NANTeL Steering Committee. Each fleet and alliance is represented along with INPO and some suppliers. Any requests for revisions to the standardized material shall be presented to the steering committee for approval.
- Industry guidance documents have been updated to reflect the changes described in this bulletin—for example, NEI 03-04 and ACAD 00-007.

### **Recommended Industry Actions**

- Implement a change management plan to address the *Company Actions* listed below.

### **Other Actions for Consideration (as required)**

- None

### **Change Management Considerations**

This is not intended to be an all-inclusive list or imply that each one of these items must be completed.

#### *Industry Activities*

- Industry webinar on Oct. 6, 2016 to provide background for initiative, INPO discussion and an open forum to clarify expectations and ask questions. Webinar information can be found at <https://web.inpo.org/Pages/Nuclear-Promise-Issues.aspx>
- Hold an industry workshop with the right personnel to work through and discuss the transition and share good practices and any learning opportunities.

#### *Company Actions*

- Review the licensing basis for Regulatory Guide commitments that may impact training associated with the badging process, such as RG 8.27 or ANSI 3.1.
- Review NRC commitments associated with plant access training material and either come up with a new strategy or change the commitment.
- Perform a gap analysis between the revised standards documents and site procedures and revise as appropriate.
- Engage IT to push certifications from learning management systems (LMS) to PADS.
- Prepare and implement course code changes as needed for NANTeL.
- Review site-specific material for FFD/BOP and PAT and create briefings as required.
- Adjust refresher training frequencies in LMS.
- Review existing refresher training dates for supplemental and utility employees in LMS and adjust to match new frequencies.
- Identify site specific requirements for badging (business ethics training, safety tagging, environmental requirements, etc.) and streamline your site's delivery.

- Have a business continuity strategy in the event NANTeL becomes unavailable or to obtain more computers to support the demand.
- Revise processes related to in-processing.

*Guidrails*

- Consider a self-assessment to evaluate change effectiveness.

**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](mailto:EfficiencyBulletin@NEI.org)

**Industry Contacts**

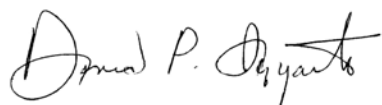
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**Industry Approval:**

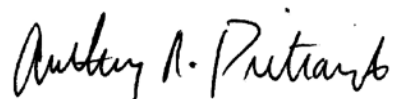
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## Attachment 1

## Standardized Training Topics and Frequencies

Topic	Population	Re-train (frequency)
Generic Fitness for Duty Behavioral Observation Program	All	12 months nominal
Generic Plant Access*	Supplemental (proctored)	24 months nominal not to exceed 27 months (Set as Quarterly)
	Utility (Non-proctored)	48 months nominal not to exceed 51 months (Set as Quarterly)
Generic Radiation Worker Training*	Supplemental (proctored)	24 months nominal not to exceed 27 months (Set as Quarterly)
	Utility (Non-proctored)	48 months nominal not to exceed 51 months (Set as Quarterly)
Radiation Worker Practical	All	None
Generic Hot Work Firewatch **	All	None
Generic Hot Work Firewatch Practical**		12 months nominal, not to exceed 13 months
Generic Asbestos Awareness #	All	Initial within 180 days and 12 months nominal, not to exceed 13 months
Generic Awareness@	All	12 months
Generic Lead Awareness #	All	None
Generic Cyber Security **	All	None
Generic Electrical Safety for Non-Qualified workers**	All	None
Generic Electrical Safety for Qualified Workers**	All	None
Generic Foreign Material Exclusion (FME) Worker**	All	None
Generic Foreign Material Exclusion (FME) Monitor**	All	None
Generic Material Handling**	All	None
Generic Scaffold Safety**	All	None
Generic Fall Protection**	All	None
Generic Confined Space Entrant/Attendant/Supervisor**	All	None
Generic Human Performance Tools **	All	None
Generic Environmental (under development)**	All	TBD

(\*) LMS retrain due dates should be updated to reflect the last day of the calendar quarter in which the training activity expires.

(#) These topics are general awareness. If any abatement of lead or asbestos is required, workers will require additional training.

(\*\*) These are the hard-hat-ready topics.

(@) These topics are required by federal regulations to be covered on an annual basis.