

**NAVAL REACTORS DOE DIRECTIVE IMPLEMENTATION BULLETIN NUMBER
426.2-71, REVISION 2**

Consistent with the Naval Nuclear Propulsion Program (NNPP) overall concept of operations, the following provides specific implementation guidance for DOE Order 426.2, PERSONNEL SELECTION, TRAINING, QUALIFICATION, AND CERTIFICATION REQUIREMENTS FOR DOE NUCLEAR FACILITIES for those activities under the Director's cognizance. The following guidance takes precedence over DOE Order 426.2 and related guidance found in other DOE documents.

a. In paragraph 3.c(2), the Order recognizes that, consistent with the responsibilities and authorities assigned by Executive Order 12344 (statutorily codified at 50 USC 2406 and 2511) and to ensure consistency throughout the joint Navy/DOE organization of the NNPP, the Director, Naval Nuclear Propulsion Program (Director) will implement and oversee all necessary requirements and practices pertaining to this DOE Order for activities under the Director's cognizance.

b. In paragraph 3.a, the Order specifies that it is applicable to DOE Hazard Category 1, 2, and 3 nuclear facilities per DOE Technical Standard (DOE-STD) 1027, HAZARD CATEGORIZATION AND ACCIDENT ANALYSIS TECHNIQUES FOR COMPLIANCE WITH DOE ORDER 5480.23, NUCLEAR SAFETY ANALYSIS REPORTS. DOE-STD 1027 recognizes that it is necessary to avoid placing excessive requirements on operations co-located with nuclear facilities. As such the requirements contained herein pertain to portions of Naval Reactors DOE sites that meet the Hazard Category 1, 2, or 3 criteria such as the S8G and MARF Prototypes at Kesselring Site Operation (KSO), Expended Core Facility and Spent Fuel Packaging Facility at the Naval Reactors Facility (NRF), and portions of the Knolls and Bettis Atomic Power Laboratories.

c. In paragraph 4.a, the Order specifies that a selection, training, qualification and certification program as described in this Order must be implemented at new and existing Hazard Category 1, 2, and 3 DOE facilities. Existing equivalent requirements represent an effective and time-proven selection, training, qualification and certification program for NNPP facilities and shall continue to be implemented in lieu of the specific requirements of DOE Order 426.2. For Naval Reactors Prototypes, these requirements include, but are not limited to, Naval Nuclear Power Training Command Training Manual, Prototype Training Manual, Qualification Guides, Naval Reactors Procedure F-10, and the Radiological Controls for Ships. For Naval Reactors Facility and KSO refueling, these requirements include, but are not limited to, the Manual for Control of Refueling, applicable Nuclear Reactor Servicing Manuals, Quality Control Manual and the Radiological Controls Manual (LAB-RC-0288). For the Knolls and Bettis Atomic Power Laboratories, these requirements include, but are not limited to the Nuclear Criticality Safety Manuals, LAB-NCS-1000 and B-NS-100.

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d. In paragraph 4.b, the Order specifies that the Field Element Manager must evaluate and approve the contractor training implementation matrix (TIM) and procedures which release an individual from portions of a training program through prior education, experience, training, and/or qualification/ certification. A TIM, to include Naval Reactors approved procedures for release of individuals from portions of training, has been reviewed by Naval Reactors which demonstrates existing requirements meet or exceed those described in the contractor requirements document. As such, existing NNPP requirements shall continue to be implemented in lieu of the specific requirements of DOE Order 426.2.

e. In paragraph 4.c, the Order specifies that the Field Element Manager must evaluate contractor training and qualification programs using the methodology described in DOE-STD-1070-94 at least once in each three year interval. During these evaluations, the Field Element Manager must verify that the TIM used to administer the contractor's training program meets the requirements of this Order. Naval Reactors Headquarters will assess personnel training and qualification at NNPP facilities during biennial evaluations or more frequently, as appropriate. Naval Reactors Field Office personnel will perform routine monitoring and surveillance of personnel training and qualifications consistent with current monitor watch requirements.

f. Paragraph 5 of the Order delineates responsibilities for implementation of the Order. Naval Reactors Headquarters carries out the responsibilities that would be assigned to the Program Secretarial Officer and the Chief Health, Safety, and Security Officer. Naval Reactors Field Offices carries out the responsibilities of the Field Element Managers with the exception of reviewing TIMs, ensuring contractors implement the requirements of the contractor requirements document and approving certification extension requests which are functions carried out by Naval Reactors Headquarters. These responsibilities will be maintained in lieu of the responsibilities listed in the Order.

g. Attachment 1 to the Order provides specific contractor requirements. As discussed above, existing equivalent NNPP practices shall continue to be implemented in lieu of the specific requirements of DOE Order 426.2.

h. Prior to biennial audits conducted by Naval Reactors Headquarters, KAPL, Bettis, NRF, and Naval Reactors Prototypes shall submit any additions, deletions, or modifications to the TIM that demonstrate compliance with this Order and associated IB. In addition, KAPL (lead), with Bettis and NRF input, should provide a consolidated list of hazard category 1, 2, and 3 operations and associated buildings within KAPL, Bettis, NRF, and KSO and update this list annually.

Enclosure (1)