

RCRA PART B PERMIT
FOR THE
IDAHO NATIONAL
ENGINEERING AND ENVIRONMENTAL LABORATORY

Volume 18 – Idaho Nuclear Technology and Engineering Center

ATTACHMENT 5

Debris Treatment Processes
Holdup and Collection Tanks
CPP-659/-1659 Storage
CPP-666 FDP Cell Container Storage
Radioactive Mixed Waste Staging Facility (CPP-1617)
Hazardous Chemical and Radioactive Waste Storage Facility (CPP-1619)

Section H

Personnel Training

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H. PERSONNEL TRAINING

This section outlines and describes the core training program for personnel involved in the management of hazardous and mixed waste at treatment, storage, and disposal (TSD) units at the Idaho Nuclear Technology and Engineering Center (INTEC), including units addressed in this permit .

A training program has been implemented to ensure that personnel involved in the management of hazardous and mixed waste at INTEC TSD units receive training consistent with the requirements of the Idaho Administrative Procedures Act (IDAPA) 58.01.05.008 and 58.01.05.012 [Title 40 Code of Federal Regulations (CFR) Part 264.16 and 270.14]. The training program is designed to ensure that personnel are trained to hazardous waste management procedures including, but not limited to, inspections, normal operations, emergency procedures, equipment, systems, and contingency plan implementation. Duties performed at the TSD units will be performed in a safe, disciplined, and professional manner.

H-1. Outline of Training Program [IDAPA 58.01.05.008; 40 CFR 264.16(a)(1)]

Training programs are developed using a systematic approach to training (SAT). The SAT process involves:

- Analyzing tasks to determine the training requirements
- Designing a plan to satisfy the training requirements
- Developing plans and all supporting training materials
- Implementing the training plans
- Evaluating the effectiveness of the training and making recommendations for changes.

1 The SAT process is used to determine the training requirement for each task listed in Table H-1.
2 The training program for TSD unit personnel involves a combination of formal [classroom, group
3 instruction, on-the-job training (OJT), etc.] and informal training sessions (one-on-one instruction,
4 required reading, etc.). The training requirements for each position are identified in Table H-1. Lesson
5 plans and OJT guides are developed to support tasks identified in Table H-1.
6

7 Programs prepared by the TSD training organization provide the core requirements to be
8 completed by the individual during training. As the program is satisfactorily completed, it is verified and
9 documented in their training records.
10

11 The training program is upgraded as needed in response to changes in job descriptions, job
12 reassignment, process or procedural changes, technological changes, or implementation of new regulatory
13 requirements that affect TSD unit operations. Revisions to the training program are approved by the
14 training director for the specific TSD unit and the job analysis data is updated to reflect the changes in the
15 training requirements.
16

17 TSD unit management works with subject matter experts to identify personnel training
18 requirements. The TSD unit training organization (1) schedules and/or provides the training, (2) revises
19 and updates training material as needed, and (3) maintains training documentation. The TSD unit training
20 organization maintains individual training records for TSD unit employees.
21

22 **H-1a. Job Tasks [IDAPA 58.01.05.008; 40 CFR 264.16(d)(1), 264.16(d)(2)]**
23

24 The job tasks for personnel involved with hazardous waste management at INTEC TSD units are
25 included in Table H-1 “Minimum Training Matrix for TSD unit Personnel” Personnel are trained to those
26 sections of the permit, which are pertinent to their specific job assignments.
27

28 Security Guards – The Security personnel are not stationed at the permitted units nor are they
29 involved in the management or handling of the waste. Security personnel receive training from the
30 security organization relative to their positions and the facilities they serve. Therefore, training of
31 security personnel is not discussed further in this section.

1 On Scene Commander – is the INEEL Fire Department Chief. The INEEL Firefighters serve the
2 INEEL in fighting fires and containing major spills, including spills of waste from waste management
3 units. The INEEL Fire Department conducts a self-contained training program for their personnel, which
4 includes procedures for handling fires and spill emergencies involving hazardous materials and hazardous
5 mixed waste at the INEEL. Therefore, training of fire fighters is not discussed further in this section.
6

7 Emergency Director – is trained on the INEEL (Site-wide) Emergency Plan/RCRA Contingency
8 Plan or Industrial Safety and Hygiene Program as part of his/her duties. The ED will be informed by the
9 EAM or facility personnel at INTEC. Therefore, training of ED is not discussed further in this section.
10

11 **H-1b. Training Content, Frequency, and Techniques [IDAPA 58.01.05.008;**
12 **40 CFR 264.16 and (d)(3)]**
13

14 The TSD unit training program consists of a combination of classroom instruction and OJT.
15 Additionally, TSD unit employees receive new employee orientation and training. (All employees
16 working at or assigned as part-time/frequent visitor to Site facilities are required to complete annual
17 facility access training and general employee radiation training [GERT] unless they are currently trained
18 as radiation workers.)
19

20 The initial training includes a general orientation of INEEL and TSD unit procedures including
21 evacuation and alert procedures, training requirements, and emergency equipment locations. The initial
22 training provides TSD unit personnel with training commensurate with their job assignments in the
23 following areas:
24

- 25 • General description of the INTEC
- 26
- 27 • Job-related procedures, policies, and instructions
- 28
- 29 • Radiological health and safety program
- 30
- 31 • Fire protection program
- 32
- 33 • Hazards associated with the TSD unit.

1 Resource Conservation and Recovery Act (RCRA) training is conducted annually for INTEC
2 TSD unit employees to address changes that have occurred which include such topics as permit status,
3 permit requirements, contingency and inspection plan implementation, and hazardous waste management
4 procedures for the TSD unit(s) to which they are assigned.

5
6 The following major knowledge areas are included and evaluated based on job position and
7 formal criteria identified in the job analysis:

- 8
- 9 • RCRA requirements as they relate to INTEC unit operations
- 10
- 11 • Hazardous materials
- 12
- 13 • INTEC TSD unit systems and components (including waste treatment processes and
14 operations)
- 15
- 16 • Normal operating procedures and shutdown procedures
- 17
- 18 • Emergency or off-normal operating procedures
- 19
- 20 • Inspections and equipment maintenance
- 21
- 22 • Occupational Safety and Health Administration (OSHA) and related health and safety
23 requirements
- 24
- 25 • INTEC TSD unit and operational/administrative procedures.
- 26

27 TSD unit work and maintenance is performed by appropriate personnel whose qualifications have
28 been verified before beginning work.

29
30 Employees may be given written and/or oral examinations, operational evaluations, and reviews
31 to ensure that they are adequately trained relative to their job tasks. Results of examinations, written or
32 oral evaluations, and reviews are documented. All completed qualification standards, checklists,
33 examinations, written evaluations, and documented oral evaluations are maintained in each individual's
34 training record.

1 Table H-1 shows the task training requirements for TSD unit personnel involved in
2 hazardous/mixed waste operations at INTEC TSD units addressed in this permit. TSD unit personnel
3 may receive additional training beyond that shown in Table H-1. This training is documented and
4 included in employee training records.

5
6 Occasionally, TSD unit personnel attend training classes conducted external to the INEEL or
7 conducted at the INEEL by non-INEEL subcontract personnel. In order to verify an employee's
8 attendance at these training courses, a copy of the class certification or other documentation is maintained
9 in the individual's training record.

10
11 **H-1c. Training Director [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]**

12
13 For all TSD units the training director functions in conjunction with his/her designee(s) to insure
14 that all segments and responsibilities associated with the training program are accomplished. The training
15 director provides overall leadership and management direction to the TSD unit training organization. The
16 director's duties include the following:

- 17
18 • Provide direction to the TSD unit training organization
19
20 • Ensure that performance of training personnel is evaluated
21
22 • Approve TSD unit training program
23
24 • Ensure that all program objectives and requirements are satisfied and that the training
25 program meets the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR
26 1910.120.

27
28 The training director or his/her designee(s) is responsible for ensuring that TSD unit personnel
29 are trained in waste management and contingency plan implementation, including emergency procedures,
30 and for ensuring that TSD unit personnel receive training appropriate to their tasks. The training director
31 also reviews documentation, including feedback from audits and appraisals, operating logs, emergency
32 exercise critiques, and employee recommendations, for possible inclusion into the TSD unit training
33 programs.

Table H-1. Minimum Training Matrix for TSD Unit Personnel.

TASK	INITIAL EMPLOYEE TRAINING	RADIOLOGICAL TRAINING	24-HOUR OSHA 1910.120 ¹	ANNUAL RCRA TRAINING	SECTION OF PERMIT PERSONNEL ARE TRAINED TO	POSITION TITLE CONDUCTING ACTIVITY
Sampling	X	X	X	X	Section C	waste technical specialist
Analysis	X	X	X	X	Section C	waste technical specialist
Waste Verification	X	X	X	X	Section C	waste technical specialist facility operator waste handler
Waste Acceptance	X	X	X	X	Section C	waste technical specialist facility operator waste handler
Transport	X	X	X	X	Section D, Section G	waste technical specialist facility operator waste handler equipment operator
Unloading/Loading	X	X	X	X	Section D, Section G	waste technical specialist facility operator waste handler equipment operator
Container Management	X	X	X	X	Section D, Section F, Section G	waste technical specialist facility operator
Unit Inspection	X	X	X	X	Section D, Section F, Section G	waste technical specialist facility operator
Recordkeeping - Inspection Records	X	X	X	X	Section D, Section F	waste technical specialist facility operator

TASK	INITIAL EMPLOYEE TRAINING	RADIOLOGICAL TRAINING	24-HOUR OSHA 1910.120 ¹	ANNUAL RCRA TRAINING	SECTION OF PERMIT PERSONNEL ARE TRAINED TO	POSITION TITLE CONDUCTING ACTIVITY
Recordkeeping - IWTS	X	X	X	X	Section C	waste technical specialist
Recordkeeping - Emergency Plan/Contingency Plan	X	X	X	X	Section G	waste technical specialist emergency action manager (EAM) facility operators
Emergency Response	X	X	X	X	Section G	waste technical specialist facility operator waste handler equipment operator emergency action manager (EAM)
Training	X	X	X	X	All	training manager/director or the designee(s)
Supervision	X	X	X	X	All	supervisor facility operator (limited supervision)
Facility support	X	X	X	X	Section G	Support personnel (Maintenance, Radcon etc.)
Treatment	X	X	X	X	All	supervisor facility operator
1. Personnel who do not perform work in the regulated units will not receive this training						

Section C - Waste Characterization
Section D - Process Information

Section F - Procedures to Prevent Hazards
Section G - Preparedness, Prevention, and Contingency Plan

1 **H-1d. Relevance of Training to Job Tasks [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]**

2
3 Individual training program profiles are prepared for each TSD unit position that requires a
4 formal training program.

5
6 At a minimum, each individual training program profile identifies the following:

- 7
- 8 • Job description
 - 9
 - 10 • Qualifications
 - 11
 - 12 • Training requirements.
 - 13

14 Profiles typically identify qualification requirements. Occasionally, a position may require
15 specialized training. Special-case training is documented in individual training records. Profiles include
16 requirements for hazardous/mixed waste management or handling and emergency response training.

17
18 Supervisors have the responsibility for evaluating training requirements for TSD employees.
19 These supervisors receive additional training in how to conduct and evaluate OJT.

20
21 Individuals who demonstrate an equivalency for specific requirements or prerequisites identified
22 in the training profile may be exempted from requirements in accordance with established procedures.
23 Exemptions/equivalencies must be approved by the training director. Each exemption/equivalency is
24 granted in writing and documented in the individual's training record.

25
26 **H-1e. Training for Emergency Response [IDAPA 58.01.05.008; 40 CFR 264.16(a)(3)]**

27
28 Emergency response training is provided to all personnel assigned to or associated with TSD
29 units, including specialized training for employees with specific emergency action responsibilities, such
30 as the Emergency Action Manager (EAM) and Emergency Response Organization (ERO) personnel. The
31 following presents an overview of the emergency response training.

1 General emergency response training of TSD unit ERO personnel includes training on the INEEL
2 EP/RCRA CP which covers the following topics:

- 3
- 4 • Spill Control Plan
- 5
- 6 • Evacuation/accountability
- 7
- 8 • Emergency drill/exercise
- 9
- 10 • RCRA
- 11
- 12 • Emergency Plan Implementing Procedures
- 13
- 14 • Emergency preparedness
- 15
- 16 • Incident command system
- 17
- 18 • Inspection and repair of facility emergency monitoring equipment.
- 19

20 ERO members respond to emergency events. ERO members receive initial training and annual
21 requalification training, in addition to training provided to general employees. Training of ERO members
22 is outlined by position in company procedures. All INTEC employees receive general employee
23 emergency response action training.

24

25 **H-2. Implementation of Training Program [IDAPA 58.01.05.008; 40 CFR 264.16(b),**
26 **264.16(d)(4), 264.16(e)]**

27

28 After completion of new employee orientation, designated employees enter a training program
29 specific to their job assignment. Persons holding qualifications are retrained and reevaluated as mandated
30 by procedures. Job assignments which are required for the completion of a training program have time
31 and performance limitations that must be satisfied to meet program qualification criteria.

1 RCRA training is completed within the first six months of the individual's employment or
2 assignment, and at least annually thereafter, for positions involving TSD unit operations. Throughout the
3 training program and until completion, employees do not perform their job duties unsupervised.
4

5 **H-3. Training Records [IDAPA 58.01.05.008; 40 CFR 264.16(d)(4) and (e)]**
6

7 Individual training records are maintained for personnel assigned to TSD units. Training records
8 include documentation of completed training, such as class rosters, signed checklists, completed exams,
9 data base printouts from additional training classes attended, and other documents verifying training. The
10 original training records are maintained by the presenting organizations, which enter course completion
11 information into a database. A hard copy of this information is also entered into the individual's training
12 record.
13

14 The training records include the names of employees filling each TSD unit position. Job tasks
15 and associated training requirements for each TSD unit are found in Table H-1.
16

17 Individual training records include, as a minimum, the following:
18

- 19 • Initial training and retraining programs
- 20
- 21 • Attendance records of training received
- 22
- 23 • Results of exams, walk through, and job performance assessments related to certification.
24

25 Training records for current employees at each TSD unit are maintained until closure of the unit
26 or the employee terminates or transfers to a non-TSD unit position. The training records of terminating
27 employees are maintained at the TSD unit for a minimum of three years from the date the employee last
28 worked at a TSD unit. The training records for TSD unit employees who transfer to a non-TSD unit
29 position within the company are forwarded to the employee's new organization where they continue to be
30 available for at least three years.