

**LOW-ACTIVITY WASTE PRETREATMENT SYSTEM  
ADDENDUM G  
PERSONNEL TRAINING  
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

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**ADDENDUM G  
PERSONNEL TRAINING**

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## 1 **G. PERSONNEL TRAINING**

2 This Addendum discusses personnel training requirements based on Washington Administrative Code  
3 (WAC) 173-303-330, Dangerous Waste Regulations and the Hanford Facility Resource Conservation and  
4 Recovery Act (RCRA) Permit, WA7890008967 (Permit).

5 This Addendum provides the information necessary to comply with training requirements associated with  
6 permitted dangerous waste management activities at Low-Activity Waste Pretreatment System (LAWPS)  
7 Operating Unit Group (OUG).

### 8 **G.1 Introductory and Continuing Training Program**

9 The dangerous waste training program consists of introductory and continuing training programs that are  
10 designed to prepare personnel to operate and/or maintain the LAWPS Dangerous Waste Management  
11 Units (DWMUs) in a safe, effective, and environmentally sound manner. In addition to preparing  
12 personnel to manage and maintain LAWPS DWMUs under normal conditions, the training programs  
13 ensure that personnel are prepared to respond in a prompt and effective manner should abnormal or  
14 emergency conditions occur. Emergency response training is consistent with the description of actions  
15 contained in Addendum J, "Contingency Plan."

16 Prior to first receipt of waste, a LAWPS Dangerous Waste Training Plan (DWTP) will be developed that  
17 identifies each job title/position and requisite skills, education requirements, and other qualifications for  
18 LAWPS personnel.

19 The introductory and continuing training programs contain the following objectives:

- 20 • Train Hanford Facility personnel to perform their duties in a way that ensures compliance with  
21 WAC 173-303.
- 22 • Train Hanford Facility personnel on dangerous waste management activities (including  
23 implementation of the contingency plan) relevant to the job titles/positions in which they are  
24 employed.
- 25 • Ensure Hanford Facility personnel can respond effectively to emergencies.

26 The introductory and continuing training programs meet the requirements of WAC 173-303-330,  
27 *Personnel training*, through general Hanford Facility training and Task Specific/Operations training as  
28 outlined below.

#### 29 **G.1.1 Introductory Training**

30 Introductory training includes general Hanford Facility training and LAWPS unit-group specific training.  
31 General Hanford Facility training is described below. Unit-group specific training is provided to LAWPS  
32 personnel allowing those personnel to work unescorted, and in some cases is required for escorted access.  
33 Personnel will be supervised until training is complete and cannot perform a task for which they are not  
34 trained, except to gain required experience while under the direct supervision of a trained employee, or a  
35 professional trainer as described in Section G.2.1.

36 Hanford General Employee Training (HGET): Hanford Facility personnel will receive Hanford Facility  
37 training described in Permit Attachment 5, *Hanford Facility Personnel Training Program*. This training  
38 provides an orientation on dangerous waste management activities conducted at the Hanford Facility and  
39 includes the following:

- 40 • Description of emergency signals and appropriate personnel response.
- 41 • Identification of contacts for information regarding dangerous waste management activities.
- 42 • Introduction to waste minimization concepts.
- 43 • Identification of contact(s) for emergencies involving dangerous waste.

- 1 • Familiarization with the applicable portions of the Permit Attachment 4, *Hanford Emergency*  
2 *Management Plan* (DOE/RL-94-02).

3 Contingency Plan training: LAWPS personnel receive training on applicable portions of  
4 DOE/RL-94-02 in the general LAWPS training. To ensure effective emergency response, personnel  
5 receive training on the content of the actions described in Addendum J as well.

6 Emergency Coordinator training: LAWPS personnel facilitating emergency coordinator duties, WAC  
7 173-303-360, *Emergencies*, such as the Building Warden (BW) within the Hanford Incident Command  
8 System (ICS); receive training on implementing Addendum J and ICS BW responsibilities.

9 Non-Low-Activity Waste Pretreatment System Personnel or Visitors: As appropriate for the locations  
10 and activities, the Permittees will ensure training to non-LAWPS personnel or visitors is undertaken.  
11 Non-LAWPS personnel or visitors include individuals not permanently assigned exclusively to the  
12 LAWPS and who do not have dangerous waste management responsibilities or supervision of such  
13 activities. These individuals include but are not limited to administrative personnel, regulatory oversight,  
14 transient sampling personnel, temporary personnel and other personnel not permanently assigned to  
15 LAWPS.

## 16 **G.1.2 Continuing Training**

17 Refresher training occurs on many frequencies (i.e., annual, biennial, and triennial) for operations  
18 training. When justified, some training will not contain a refresher course and will be identified as a  
19 one-time only training course. Frequency of training will be established in the DWTP.

## 20 **G.2 Description of Training Program**

21 The Training Director is responsible for directing the training program for LAWPS. The job description,  
22 duties, requisite skills, minimum education and other qualifications of the Training Director and LAWPS  
23 personnel will be described in the LAWPS DWTP.

24 Training elements of WAC 173-303-330(1)(e) applicable to LAWPS operations include the following:

- 25 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.
- 26 • Communications or alarm systems.
- 27 • Response to fires or explosions.
- 28 • Shutdown of operations.
- 29 • Key parameters for automatic waste feed cut-off systems.

30 Proper design of the training program ensures LAWPS personnel will be trained to perform their duties  
31 compliant with the Permit and with WAC 173-303 requirements. Actual job tasks, referred to as duties,  
32 include the above-referenced elements and are used to determine training requirements. As such,  
33 LAWPS personnel will receive training appropriate to the duties they perform. This enables employees to  
34 know how to respond to emergencies, handle mixed/dangerous waste properly, and perform their  
35 work/duties in a safe manner.

### 36 **G.2.1 Qualification of Personnel**

37 Qualification of facility personnel relies on a combination of required education and experience, training  
38 courses (classroom and computer based), required reading, and on-the-job training. Training is  
39 determined and assigned based on job duties described in this addendum. Documentation for completion  
40 of training (e.g., course roster, qualification card, on-the-job training card, qualification checklist,  
41 required reading, etc.) is retained in the Operating Record.

1 Various evaluation techniques are used to measure a trainee's satisfactory completion of training.  
2 Examples of evaluation techniques are performance in written and oral exams and careful observation of  
3 on-the-job performance. Periodically, employees critique formal training sessions using a training  
4 evaluation form. The evaluator determines whether the trainee has mastered the skills at the competency  
5 level necessary to perform the tasks described in the job description.

6 On-the-job training is hands-on training for the job duty provided under instruction of a trained employee  
7 or a professional trainer who serves as the course instructor. On-the-job training is assigned a course  
8 number with course completion being proof of training.

9 Training to meet the dangerous waste training program requirements is required to be completed within  
10 6 months of assignment to dangerous waste duties at the Hanford Facility, or to a new job/title position at  
11 the Hanford Facility, whichever is later. While training courses (classroom and computer based) can be  
12 completed within 6 months, on-the-job training may take longer than 6 months to complete due to facility  
13 inactivity, complexity of requirements, complexity of tasks being performed, and pursuant to collective  
14 bargaining agreements. In no case will untrained personnel be allowed to complete job duties described  
15 in this addendum unless overseen by trained personnel.

## 16 **G.2.2 Review of the Training Program**

17 All employees are required to complete HGET on an annual basis. This training is subject to biennial  
18 evaluation by HGET Approval Authorities who review, and revise HGET lessons when deemed  
19 necessary.

20 The permittee's dangerous waste training program is reviewed through an iterative process of continuous  
21 improvement.

22 The following information is evaluated as part of this review:

- 23 • Changes to the dangerous waste regulations.
- 24 • Changes to the RCRA permit.
- 25 • Procedural changes.
- 26 • Issues and opportunities for improvement identified by internal assessments.
- 27 • Issues or areas of noncompliance identified as a result of events or regulatory inspections.
- 28 • Deficiencies in staff performance of job tasks.
- 29 • Feedback on training content.

30 Changes, problems or opportunities for improvement may be addressed by revising course content, retrain  
31 frequency or delivery method. Periodically, employees critique formal training sessions using a training  
32 evaluation form. Each dangerous waste training course undergoes a full review at least every three years  
33 even if none of the conditions above indicate the need to revise the training program.

34 Training matrices included in the DWTP will indicate regularly scheduled (required) refresher training  
35 frequencies of individual courses for the express purpose of ensuring a regimented review of course  
36 material at a topical level on a specified interval.

37 Included in the review of training is an annual review of training matrices identifying minor changes  
38 (e.g. course numbers). Minor changes will be submitted as permit modification following the  
39 requirements in WAC 173-303-830(4)(a)(i), consistent with identifying changes in the DWTP which are  
40 not a decrease in the type or amount of training given to employees.

### 1 **G.3 Description of Training Plan**

2 The training plan documentation is maintained outside of the Permit, but documentation is included in the  
3 LAWPS Operating Unit Group operating record. Therefore, changes made to the training plan  
4 documentation are not subject to the Permit modification process. However, the training plan  
5 documentation is prepared to comply with WAC 173-303-330(2).

6 Documentation prepared to meet the training plan will consist of hard copy and/or electronic media. The  
7 training plan documentation will consist of one or more documents and/or a training database with all the  
8 components identified in the core document.

9 The WAC 173-303-330 requirements for training are satisfied by this addendum. A description of how  
10 training plan documentation will meet the three items in WAC 173-303-330(2) is as follows:

11 WAC 173-303-330(2)(a): "...the job title, the job description, and the name of the employee filling each  
12 job. The job description must include the requisite skills, education, other qualifications, and duties for  
13 each position."

14 Description: The specific LAWPS personnel job title/position is correlated to the waste management  
15 duties. Waste management duties relating to WAC 173-303 are correlated to training courses to verify  
16 that training is properly assigned.

17 Only names of LAWPS personnel who carry out job duties relating to Treatment, Storage, or Disposal  
18 (TSD) unit waste management operations at the LAWPS will be maintained. A list of personnel assigned  
19 to the LAWPS will be made available upon request.

20 Detailed information concerning job title, requisite skills, education, and other qualifications for  
21 personnel will be found in the DWTP documentation and will be made available upon request.

22 WAC 173-303-330(2)(b): "A written description of the type and amount of both introductory and  
23 continuing training required for each position."

24 Description: In addition to the outline provided in Section G.1, the type, amount, and description of both  
25 introductory and continuing training relevant to positions and job duties for LAWPS personnel required  
26 in the Permit will be included in the LAWPS DWTP. Certain positions may have some variability of task  
27 assignment/responsibility. Personnel assigned specific waste management duties within a position are  
28 only required to take the necessary training specific to that duty.

29 WAC 173-303-330(2)(c): "Records documenting that facility personnel have received and completed the  
30 training required by this section. The department may require, on a case-by-case basis, that training  
31 records include employee initials or signature to verify that training was received."

32 Description: The Permittees will maintain documentation for completion of training (e.g., course roster,  
33 qualification card, on-the-job training card, qualification checklist, required reading, etc.) in the LAWPS  
34 Operating Unit Group Record in accordance with Permit Condition I.C.5.

35 Note that training records are maintained in accordance with the requirements of the *Privacy Act of 1974*.  
36 Training records for personnel are available for inspection purposes through 59 Federal Regulations (FR)  
37 17091, which gives federal, state, and local government officers "routine use" access to training records  
38 where a regulatory program being implemented is applicable to a Department of Energy (DOE) or  
39 contractor program.