

**CAPSULE INTERIM STORAGE UNIT  
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

<b>Modification Date</b>	<b>Modification Number</b>
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**ADDENDUM G  
PERSONNEL TRAINING**

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**ADDENDUM G  
PERSONNEL TRAINING**

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## 1 **G.1 Introduction**

2 This addendum discusses personnel training requirements based on Washington Administrative Code  
3 (WAC) 173-303, *Dangerous Waste Regulations*, and WA7890008967, Hanford Facility Resource  
4 Conservation and Recovery Act Permit (hereinafter called Hanford Facility RCRA Permit) for the  
5 Capsule Interim Storage (CIS) Operating Unit Group (OUG).

6 Permittees will comply with the training outlined in Tables G-1 and G-2, which provide the training  
7 requirements for Hanford Facility personnel associated with dangerous and/or mixed waste management  
8 activities at CIS.

### 9 **G.1.1 Introductory and Continuing Training Program**

10 The dangerous waste training program consists of introductory and continuing training that are designed  
11 to prepare personnel to manage and maintain the CIS facility in a safe, effective, and environmentally  
12 sound manner. In addition to preparing personnel to manage and maintain the CIS facility under normal  
13 conditions, the training program ensures that personnel are prepared to respond in a prompt and effective  
14 manner should abnormal or emergency conditions occur. Emergency response training is consistent with  
15 the description of actions contained in Addendum J, "Contingency Plan."

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

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

23 The introductory and continuing training programs meet the requirements of WAC 173-303-330,  
24 *Personnel training*, through general Hanford Facility training, Contingency Plan training, Emergency  
25 Coordinator training, and Operations training as outlined in this section.

#### 26 **G.1.1.1 Introductory Training**

27 Introductory training includes general Hanford Facility training and unit-group specific training. General  
28 Hanford Facility training is described below. Unit-group specific training is provided to CIS personnel  
29 allowing those personnel to work unescorted, and in some cases is required for escorted access.  
30 Personnel cannot perform a task for which they are not properly trained, except to gain required  
31 experience while under the direct supervision of a supervisor or coworker who is properly trained, as  
32 described in Section G.2.1. Personnel must be trained within six months after their employment at or  
33 assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is  
34 later.

35 General Hanford Facility training: Hanford Facility personnel will receive general Hanford Facility  
36 training described in Hanford Facility RCRA Permit Attachment 5, *Hanford Facility Personnel Training*  
37 *Program*, within six months of hire. This training provides an orientation on dangerous waste  
38 management activities conducted at the Hanford Facility and includes the following:

- 39 • Description of emergency signals and appropriate personnel response.
- 40 • Identification of contacts for information regarding dangerous waste management activities.
- 41 • Introduction to waste minimization concepts.
- 42 • Identification of contact(s) for emergencies involving dangerous waste.
- 43 • Familiarization with the applicable portions of the Hanford Facility RCRA Permit Attachment 4,  
44 *Hanford Emergency Management Plan* (DOE/RL-94-02).

1 The Permittees will provide the necessary training to non-CIS personnel or visitors as appropriate for the  
2 locations and activities undertaken. Non-CIS personnel or visitors include individuals not permanently  
3 assigned exclusively to the CIS facility and who do not have dangerous waste management  
4 responsibilities or supervision of such activities. These individuals include but are not limited to  
5 administrative personnel, regulatory oversight, transient sampling personnel not permanently assigned to  
6 the CIS facility, and personnel utilized for temporary assignments.

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

10 Emergency Coordinator training: CIS personnel facilitating emergency coordinator duties,  
11 WAC 173-303-360, *Emergencies*, such as the Building Emergency Director (BED)/Building Warden  
12 (BW) within the Hanford Incident Command System (ICS), receive training on implementing  
13 Addendum J and ICS BED/BW responsibilities. These personnel must also become thoroughly familiar  
14 with applicable contingency plan documentation, operations, activities, location and properties of all  
15 waste handled, location of all records, and the unit/building layout.

16 Emergency Coordinator training consists of the BED/BW training courses required for facility  
17 BEDs/BWs described in Table G-1.

18 Operations training: Dangerous waste management operations training (e.g., container management  
19 training, shippers training) will be determined on a unit-by-unit basis and shall consider the type of  
20 activities performed at the OUG (e.g., surveillance). Training provided for CIS operations is identified in  
21 Table G-1. Operations training consists of the following subjects:

- 22 • Container management.
- 23 • Waste Handling.
- 24 • Container labeling.
- 25 • Position specific training as detailed in Table G-1.

### 26 **G.1.1.2 Continuing Training**

27 In accordance with the requirements for WAC 173-303-330(1)(b), *Personnel training*, dangerous waste  
28 workers participate in an annual review of training, including general Hanford Facility training and  
29 unit-group specific training. The frequencies for individual training courses is described below.

30 General Hanford Facility training: Annual refresher training is provided for general Hanford Facility  
31 training. Refer to description in Section G.1.1.

32 Contingency Plan training: Annual refresher training is provided for contingency plan training. Refer to  
33 description above in Section G.1.1.

34 Emergency Coordinator training: Annual refresher training is provided for emergency coordinator training  
35 including the BED/BW training course (Table G-1). Refer to description above in Section G.1.1.

36 Operations training: Refresher training occurs on many frequencies (i.e., annual, every other year, and  
37 every 3 years) for operations training. When justified, some training will not contain a refresher course  
38 and will be identified as a one-time only training course. Table G-1 specify the frequency for each  
39 training course.

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

41 The dangerous waste training program is overseen by a training manager who is knowledgeable in  
42 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training  
43 program by a combination of education and relevant experience. These qualifications are listed in  
44 Table G-2 as required by WAC 173-303-330(2)(a).



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

- 2 • Procedures for using, inspecting, repairing, and replacing monitoring equipment.
- 3 • Communications or alarm systems.
- 4 • Response to fires or explosions.

5 Proper design of the training program ensures CIS personnel responsible for facilitating these elements  
6 are compliant with WAC 173-303 requirements. Actual job tasks, referred to as duties, include the  
7 above-referenced elements and are used to determine training requirements. As such, CIS personnel  
8 receive training pertinent to the duties they perform. CIS duties are outlined in Table G-2. Table G-1  
9 contain specific information regarding the training requirements for CIS personnel.

### 10 **G.2.1 Qualification of Staff (Including On-the-Job Training)**

11 Training consists of a combination of self-study, classroom instruction, computer-based training, and  
12 on-the-job training (OJT) through the use of a qualification card.

13 A qualification card is the formal mechanism used to document the specialized training and performance  
14 requirements of a specific job/task (e.g. waste management, waste shipping, etc.). Qualification cards list  
15 the specific courses, required reading, and OJT activities that must be completed in order for personnel to  
16 perform the job task independently. OJT activities involve qualified personnel demonstrating a specific  
17 task, allowing the trainee to practice the task under supervision of the qualified OJT instructor.

18 The trainee's knowledge and skills are then evaluated against established standards. This can include  
19 written and/or oral examinations, evaluations, and reviews to ensure that they are adequately trained  
20 commensurate to their job title(s)/position(s). Results of examinations, evaluations, and reviews are  
21 documented. Completed checklists, examinations and evaluations are placed in each individual's training  
22 record.

23 These qualification cards are generally required to be completed within 6 months, as a means to record  
24 that personnel who perform dangerous waste activities have been provided training within 6 months of  
25 assignment. Qualification/proficiency training may, of necessity and in accordance with the provisions of  
26 collective bargaining agreements, take longer than 6 months to complete. In no case would unqualified  
27 personnel be allowed to complete specified tasks without direct oversight of certified personnel.

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

29 Facility training provides for frequent, systematic review of the various components of the training  
30 program through multiple processes.

- 31 • All employees are required to complete Hanford General Employee Training (HGET) on an  
32 annual basis. This training is subject to biennial evaluation by HGET Approval Authorities who  
33 review, and revise HGET lessons when deemed necessary.
- 34 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff  
35 feedback to incorporate changes to training curricula, and/or frequency to address such new or  
36 changing circumstances.
- 37 • Another element of the training program is to ensure employees are assigned the correct training.  
38 To accomplish this, annual employee training plan reviews are conducted by assigned managers.
- 39 • At the student level, the effectiveness of the training program is determined by reviewing student  
40 feedback (e.g. evaluation forms) and evaluating student performance (e.g. test scores). Any  
41 changes deemed necessary to the training, will be addressed with a revision and documented in  
42 the operating record.

- The training matrices (Table G-1) included in this addendum indicate regularly scheduled (required) refresher training frequencies of individual courses for the express purpose of ensuring a regimented review of course material at a topical level on a specified interval.

### G.3 Description of Training Plan

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

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

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

Only names of CIS personnel who carry out duties relating to unit-group dangerous waste management activities are maintained. A list of personnel assigned to CIS is available upon request.

A summary of requisite skills, education, and other qualifications for job title(s)/position(s) is summarized in Table G-2. Detailed information concerning job title, requisite skills, education, and other qualifications for personnel can be provided upon request.

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

Description: In addition to the outline provided in Section G.1, training courses developed to comply with the introductory and continuing training programs are identified and described in Table G-1. Certain job titles/positions identified in Table G-1 may have some variability of task assignment/responsibility. Personnel assigned specific dangerous waste management duties within a job title/position are only required to take the necessary training specific to those duties. Training for assigned dangerous waste management duties are located in Table G-1.

Note that equivalent training can be used to meet the dangerous waste training requirements outlined in Table G-1 and G-2. Employees can substitute courses for the required training if the course is both similar in nature and quality and accomplishes the duties of the position to which he or she is assigned. Personnel must show by documentation or certification that an employee's training has resulted in training equivalency to the training required.

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

Description: As specified in Permit Condition II.C.1, the Permittees will maintain documentation in accordance with WAC 173-303-330(2) and (3) in the Hanford Facility Operating Record (CIS portion).

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

**Table G-1 Personnel Training**

Course Number	Course Title/Description	Frequency	Job Title/Position						
			SOM	Waste Shipper <sup>a</sup>	Maintenance Crafts	NCO	TBD	ECO	BED/BW
<b>General</b>									
000001/000019	Hanford General Employee Training (CBT)/Hanford General Employee Training Refresher (CBT) <sup>d</sup> <ul style="list-style-type: none"> <li>Standard alarms, chemical spills, security, hazards, signs, escorts, badge requirements, and overall safety.</li> </ul>	Initial/Annual	X	X	X	X	X	X	X
<b>Facility Health &amp; Safety</b>									
TBD	Capsule Storage Area (CSA) Orientation (CBT) <ul style="list-style-type: none"> <li>CSA facility overview, entry requirements, staging areas, and overall safety.</li> </ul>	Initial	X	X <sup>b</sup>	X	X	X	X	X
03E179	Fuels Facility Emergency and Hazard Identification Checklist <sup>c</sup> (CBT) <ul style="list-style-type: none"> <li>Location/content of facility-specific hazards, hazard communication program, facility response actions, and waste management practices.</li> </ul>	Annual	X	X <sup>b</sup>	X <sup>b</sup>	X	X	X	X
<b>Waste Management</b>									
035100/035110	Container Waste Management (Classroom)/Container Waste Management Refresher (CBT) <sup>d</sup> <ul style="list-style-type: none"> <li>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container management.</li> </ul>	Initial/Annual	X		X <sup>c</sup>	X			
02006G	Waste Management Awareness (Classroom) <ul style="list-style-type: none"> <li>Introductory waste management topics, waste minimization, modifications, spills, and recordkeeping.</li> </ul>	Initial			X <sup>c</sup>				

**Table G-1 Personnel Training**

Course Number	Course Title/Description	Frequency	Job Title/Position						
			SOM	Waste Shipper <sup>a</sup>	Maintenance Crafts	NCO	TBD	ECO	BED/BW
<b>Waste Services</b>									
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom) <ul style="list-style-type: none"> <li>Shipping techniques on hazardous waste labels, containers, packing, and manifesting.</li> </ul>	Initial		X					
020078	Advanced Mixed Waste Shipper Certification Training <sup>d</sup> (Classroom) <ul style="list-style-type: none"> <li>Shipping techniques on hazardous waste labels, containers, packing, and manifesting.</li> </ul>	Every 3 years		X					
<b>Building Emergency</b>									
037500/037525	Building Warden Initial Training for Low-Hazards Facilities <sup>f</sup> /Building Warden Refresher Training for Low-Hazards Facilities <sup>d, f</sup> <ul style="list-style-type: none"> <li>BW performance expectations and responsibilities as outlined in DOE/RL-94-02 for preparation, response, and recovery from emergency events at respective facility.</li> </ul>	Initial/Annual							X
02028B/037515	Building Emergency Director Initial Training (Classroom) <sup>f</sup> /Building Emergency Director Refresher Training <sup>d</sup> (CBT) <sup>d, f</sup> <ul style="list-style-type: none"> <li>BED performance expectations and responsibilities as outlined in DOE/RL-94-02 for preparation, response, and recovery from emergency events at respective facility.</li> </ul>	Initial/Annual							X

**Table G-1 Personnel Training**

Course Number	Course Title/Description	Frequency	Job Title/Position						
			SOM	Waste Shipper <sup>a</sup>	Maintenance Crafts	NCO	TBD	ECO	BED/BW
TBD	Capsule Storage Area Building Emergency Director Qualification (XXX) <sup>f</sup> <ul style="list-style-type: none"> <li>Emergency response actions and responsibilities of the BED specific to the Capsule Storage Area.</li> </ul>	Initial							X
<b>Environmental</b>									
600100	Environmental Compliance Officer – Core (OJT) <ul style="list-style-type: none"> <li>Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices.</li> </ul>	Initial						X	
705610	Fuels Storage – Environmental Compliance Officer (OJT) <ul style="list-style-type: none"> <li>Facility specific environmental requirements and processes, including management of regulated waste and environmental impacts from operations.</li> </ul>	Initial					X <sup>g</sup>		
<b>Facility Operations</b>									
TBD/TBD	Capsule Storage Area Nuclear Chemical Operator Initial Qualification Card (XXX)/Capsule Storage Area Nuclear Chemical Operator Requalification <sup>d</sup> (XXX) <ul style="list-style-type: none"> <li>Surveillance activities associated with the CSA and mandated by dangerous waste regulations.</li> </ul>	Initial/Every 2 years				X			

**Table G-1 Personnel Training**

Course Number	Course Title/Description	Frequency	Job Title/Position						
			SOM	Waste Shipper <sup>a</sup>	Maintenance Crafts	NCO	TBD	ECO	BED/BW
<b>Facility Management</b>									
300226	Core Fundamentals for Shift Managers in Training (OJT) <ul style="list-style-type: none"> <li>Management of activities and tasks associated with emergency response, emergency or abnormal operations, inspections, and communications.</li> </ul>	Initial	X						
TBD/TBD	Capsule Storage Area Shift Operations Manager (XXX)/Capsule Storage Area Shift Operations Manager Requalification <sup>d</sup> (XXX) <ul style="list-style-type: none"> <li>Management of activities and tasks associated with emergency response, emergency or abnormal operations, inspections, and communications.</li> </ul>	Initial/Every 2 years	X						

<sup>a</sup>Training is only required during the initial transfer of casks to the CSA and the shipment of the casks to their final disposal location.

<sup>b</sup>Personnel that do not have this training will be escorted.

<sup>c</sup>Personnel may have training in course 03E179 or 03E079.

<sup>d</sup>Refresher/requalification training is taken only after the initial training is completed.

<sup>e</sup>Maintenance Crafts may take course 02006G or 035100. Course 02006G is an awareness level class that satisfies the requirements of the job duties. Course 035100 is an operational level class that satisfies and exceeds the requirements identified in course 02006G. Only those maintenance craft personnel taking course 035100 are required to take retrain course 035110.

<sup>f</sup>The Emergency Coordinator is defined as a BW during pre-active life, and as a BED during active life.

<sup>g</sup>Required training only for permanently assigned ECO.

BED = Building Emergency Director

NCO = Nuclear Chemical Operator

BW = Building Warden

OJT = On-the-Job Training

CBT = Computer Based Training

SOM = Shift Operations Manager

ECO = Environmental Compliance Officer

TBD = to be determined

**Table G-2 Capsule Storage Area Job Description**

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
SOM	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems.</li> <li>• Respond to fires or explosions.</li> <li>• Receive shipment of dangerous or mixed waste.</li> <li>• Ensure corrective actions are addressed for problems identified by inspections.</li> <li>• Dispatch personnel responsible for access control.</li> <li>• Prepare and submit environmental records.</li> </ul>	<u>Requisite skills</u> Three years of nuclear facility experience, or education/experience equivalent <u>Education</u> High School Diploma or equivalent <u>Other qualifications</u> None
Waste Shippers	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Prepare and certify waste shipment documentation for both on-site and off-site shipments of waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<u>Requisite skills</u> None <u>Education</u> High school diploma <u>Other qualifications</u> None
Maintenance Crafts	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Routine maintenance within the TSD facility.</li> <li>• Prepare environmental records.</li> </ul>	<u>Requisite skills</u> One year maintenance related <u>Education</u> None <u>Other qualifications</u> None
NCO	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems.</li> <li>• Respond to fires or explosions.</li> <li>• Perform annual inspection of CSA (signs, exterior surfaces and surrounding area, cask labels).</li> <li>• Perform monthly inspection of CSA general area.</li> <li>• Prepare environmental records.</li> </ul>	<u>Requisite skills</u> None <u>Education</u> High school diploma or equivalent <u>Other qualification</u> None

**Table G-2 Capsule Storage Area Job Description**

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
TBD	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems.</li> <li>• Respond to fires or explosions.</li> <li>• Perform inspections of temperature monitoring system.</li> <li>• Prepare environmental records.</li> </ul>	TBD
ECO	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Ensure operations are consistent with requirements contained in Dangerous Waste Regulations, WAC 173-303.</li> <li>• Prepare and submit environmental records.</li> </ul>	<u>Requisite skills</u> Experience with environmental regulations <u>Education</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience <u>Other qualifications</u> None
BED*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems.</li> <li>• Provide direction during emergencies, evacuation or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<u>Requisite skills</u> Three years nuclear facility experience <u>Education</u> High school diploma or equivalent <u>Other qualifications</u> None
BW*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems.</li> <li>• Provide direction during emergencies, evacuation or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BW in Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<u>Requisite skills</u> None <u>Education</u> High school diploma or equivalent <u>Other qualifications</u> None



**Table G-2 Capsule Storage Area Job Description**

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Training Manager	<ul style="list-style-type: none"> <li>• Ensure the application of a graded, systematic approach to training program development and administration.</li> <li>• Ensure the training program will comply with WAC 173-303.</li> <li>• Approve training program content and provide final approval.</li> </ul>	<u>Requisite skills</u> Four years nuclear facility experience <u>Education</u> Bachelor of Science or Bachelor of Arts <u>Other qualifications</u> None

\*The Emergency Coordinator is defined as a BW during pre-active life, and as a BED during active life.

RCRA = *Resource Conservation and Recovery Act of 1976.*

TSD = treatment, storage, and disposal.

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