PERMIT ATTACHMENT 5
HANFORD FACILITY PERSONNEL TRAINING PROGRAM
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

Modification Date	Modification Number

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5.0 HANFORD FACILITY PERSONNEL TRAINING PROGRAM

This Attachment provides a description of the Hanford Facility Personnel Training Program. This program description discusses personnel training requirements based on Washington Administrative Code (WAC) 173-303, *Dangerous Waste Regulations* and the Hanford Facility Dangerous Waste Permit, WA7890008967 (Permit). The Training Program described in this Attachment is applicable to facility personnel.[1] The Hanford Facility Personnel Training Program consists of general facility training and unit group specific training, and includes classroom instruction, computer based training, or on-the-job training (OJT). Classroom instruction, computer based training, and OJT is identified in the unit-specific personnel training addenda in Permit Parts III, V, and VI. Unit group specific training is specific to particular dangerous waste management unit groups or operationally related dangerous waste management unit groups in the Permit. Training requirements specific to Soil and Groundwater Project Samplers, are described in Permit Attachment 8, *Inspection and Training Plan for Groundwater Monitoring Wells*.

5.1 Introductory and Continuing Training

Introductory and continuing training are designed to prepare personnel to manage and maintain the unit groups in Permit Parts III, V, and VI in a safe, effective, and environmentally sound manner and to perform waste management duties related to their job descriptions located in the unit-specific training plans. In addition to preparing personnel to manage and maintain these dangerous waste management unit groups under normal conditions, the training ensures that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is based upon WAC 173-303-330(1)(e) and are consistent with the description of actions contained in the unit-specific contingency plans in Permit Parts III, V, and VI. The introductory and continuing training will provide the following:

- Train personnel to perform their duties in a way that ensures the Hanford Facility's compliance with the Permit.
- Train personnel dangerous waste management procedures, including implementation of the contingency plan, relevant to the job titles/positions in which they are employed.
- Ensure personnel can respond effectively to emergencies.

5.1.1 Introductory Training

Introductory training consists of the following: General Hanford Facility Orientation, Contingency Plan Training, Emergency Coordinator Training, Environmental Professional Training, and Task Specific/Operations Training.

Introductory training includes general facility training and any unit-specific training applicable to personnel job descriptions and work assignments. Personnel cannot perform a waste management duty, for which they are not properly trained, except to gain required experience while under the direct supervision of a person knowledgeable in dangerous waste management procedures, and must include training relevant to the positions in which the personnel are employed. Upon successful completion of introductory training, personnel may work unescorted/unsupervised, unless otherwise noted in the Permit Parts III, V, and VI.

[1]"Personnel" or "facility personnel" means all persons who work at, or oversee the activities of a dangerous waste facility, and whose actions or failure to act, may result in noncompliance with the requirements of this Permit.

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Personnel must be trained within six months after their employment at or assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later. Retraining of introductory training may not be necessary when personnel are reassigned. Prior to completion of required training, new personnel must work under the direct supervision of trained personnel until their training is completed.

5.1.1.1 General Hanford Facility Orientation

Except for Pacific Northwest National Laboratory (PNNL) 325 Hazardous Waste Treatment Unit personnel who take General 325 Radiochemical Processing Laboratory Facility Training, General Hanford Facility Orientation is covered in Hanford General Employee Training (HGET). HGET provides an orientation to dangerous waste management activities being conducted on the Hanford Facility. General facility orientation provides:

- Description of emergency signals and appropriate response.
- Identification of contact(s) for emergencies involving dangerous waste and dangerous waste management activities.
- Introduction to waste minimization concepts.
- Identification of contact(s) for emergencies involving dangerous waste.
- Familiarization with the applicable portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02).

5.1.1.2 Contingency Plan Training

This training includes actions required to meet applicable training requirements of WAC 173-303-330(1)(e), to respond effectively to emergencies at each unit group in Parts III, V, and VI that may be applicable to the job title/position of a particular individual.

5.1.1.3 Emergency Coordinator Training

Personnel whose job title/position require performing emergency coordinator duties, defined in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), (e.g., Building Emergency Director) in the Hanford Incident Command System, receive training on implementation of the contingency plan and training assigned in applicable unit group specific permit conditions in Permit Parts III and V. In accordance with WAC 173-303-360(1), Emergency Coordinators must also be thoroughly familiar with operations, activities, location and properties of all waste handled, location of all records, and the unit/building layout for each unit group to which they are assigned.

5.1.1.4 Environmental Professional Training

Most personnel responsible for environmental compliance receive training on applicable environmental regulations, the Permit, regulator inspections and notifications, preparation of environmental records, and pollution prevention practices.

5.1.1.5 Task Specific/Operations Training

Dangerous waste management Task Specific/Operations training (e.g., waste designation training, shippers training) is specified for particular job title/positions in the unit group specific requirements in the Permit Parts III, V, and VI. Task Specific/Operations training provides training to personnel on the operation of dangerous waste management units (e.g., container management unit) and the type of activities performed at the waste management unit (e.g., sampling).

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5.1.2 Continuing Training

Continuing training includes review of General Hanford Facility Training, Contingency Plan Training, Emergency Coordinator Training, Task Specific/Operations Training, and in some cases Environmental Professional Training as specified in the unit group specific personnel training addenda.

Continuing training is administered annually and includes training with two-year or three-year retraining frequencies. A course is administered annually if it is administered within 30 days after the retraining date set for that course.

5.2 Elements of Unit-Specific Training

Unit group specific training requirements not addressed in Permit Condition II.C, Permit Attachment 5, and Permit Attachment 8 for personnel assigned to dangerous waste management units are included in Permit Parts III, V, and VI. Each unit group specific Chapter will contain a personnel training addendum consisting of a Training matrix. Each training matrix contains the following:

- Training categories (from Permit Attachment 5, Sections 5.1.1 and 5.1.2).
- Job title/position (e.g., staff, dangerous waste worker categories, Building Emergency Director).
- Course number, course title/description, and course training frequency required for each job title/position.

Changes to the unit-specific group training matrix are subject to the modification in accordance with Permit Condition I.C.1.

5.3 Training Records

Personnel training records are maintained in hard copy form or by using electronic data storage as specified in Permit Conditions II.C.4.b. and II.I.2. At a minimum, training records will consist of proof of course completion (e.g., electronic signature, supervisor initials, data base) for the training received, and training date(s). Training records are maintained in accordance with the requirements of Permit Condition II.C.4.

5.4 Training Program Direction

The Dangerous Waste Training Programs are overseen by Dangerous Waste Training Program Directors or Training Managers. Additional direction may be provided by subject matter experts, unit management, a training organization, or some combination of these.

Direction of the training program is met by the following:

- Dangerous Waste Training Program Director or Training Manager: Knowledgeable in dangerous waste management procedures and is otherwise qualified to design a Dangerous Waste Training Program by a combination of education and relevant experience.
- Subject Matter Experts: Knowledgeable person regarding applicable dangerous waste management requirements to provide for compliance with the Permit.
- Unit Management: Identify roles, responsibilities, and training for personnel assigned to the unit in accordance with the training plan.
- Training Organization: Collect and record documentation of training taken by personnel, and maintain training records.

5.5 Qualification of Personnel

Qualification of personnel rely on a combination of required education and experience, training courses (classroom and computer based), required reading, and OJT through use of a qualification card.

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A qualification card is the formal mechanism used to document the specialized training and performance requirements of a specific job/task. Qualification cards list the specific courses, required reading, and OJT activities that must be completed in order for personnel to perform the job task independently. OJT activities involve personnel demonstrating a specific task, allowing the trainee to practice the task under supervision of an evaluator (e.g. trained employee or professional trainer) who serves as the course instructor. The trainee's knowledge and skills are then evaluated against established standards. This can include written and/or oral examinations, evaluations, and reviews to ensure that they are adequately trained commensurate to their job title(s)/position(s). Results of examinations, evaluations, and reviews are documented. Completed checklists, examinations and evaluations are placed in each individual's training record with course completion being proof of training.

Training to meet the Dangerous Waste Training Program requirements is required to be completed within six months of assignment to dangerous waste duties or to a new job/title position. While training courses (classroom and web/computer based) can be completed within six months, OJT training may take longer than six months to complete due to facility inactivity, complexity of requirements, complexity of tasks being performed, and pursuant to collective bargaining agreements. Unqualified personnel are not allowed to complete OJT specified tasks or job duties without direct oversight of certified OJT personnel. Not all job titles/positions require a qualification card. See unit-specific personnel training addenda and Permit Attachment 8 for job titles/positions that require a qualification card.

5.6 Review of the Training Program

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

- Most employees are required to complete HGET on an annual basis. This training is subject to biennial evaluation by HGET Approval Authorities who review, and revise HGET lessons when deemed necessary.
- The Permittee regularly reviews training course content to account for rule changes, changes to the Permit, procedural changes, facility changes, observed difficulties, staff feedback to incorporate changes to training curricula, and/or frequency to address such new or changing circumstances.
- Another element of the training program is to ensure employees are assigned the correct training. To accomplish this, annual employee training plan reviews are conducted by assigned managers or delegated staff.
- At the student level, the effectiveness of the training program is determined by reviewing student feedback (e.g. evaluation forms) and evaluating student performance (e.g. test scores). Any changes deemed necessary to the training will be addressed with a revision and documented in the Hanford Facility Operating Record.

5.7 Description of Training Plans

Descriptions of the training plans are identified in the applicable unit group specific personnel training addenda in the Permit Parts III, V, and VI.

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