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Class ~~1-3~~ Modification  
~~March 31, 2009~~ May 2014

WA7 89000 8967, Part III, Operating Unit 5  
325 Hazardous Waste Treatment Units

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## G. PERSONNEL TRAINING

This Addendum discusses personnel training requirements based on [WAC 173-303](#) and the Hanford Facility RCRA Permit, WA7 89000 8967 (Permit). In accordance with [WAC 173-303-806\(4\)\(a\)\(xii\)](#), the Hanford Facility Dangerous Waste Part B Permit Application must contain two items: (1) an outline of both the introductory and continuing training programs by owners or operators to prepare persons to operate or maintain the TSD facility in a safe manner as required to demonstrate compliance with [WAC 173-303-330](#) and (2) a brief description of how training will be designed to meet actual job tasks in accordance with the requirements in [WAC 173-303-330\(1\)\(d\)](#). Permit Condition II.C (Personnel Training) contains training requirements applicable to Hanford Facility personnel and non-Facility personnel.

~~This Addendum provides the information necessary to comply with these training requirements at the 325 Hazardous Waste treatment Treatment Units (HWTUs) is demonstrated by information contained in Permit Attachment 33, Chapter 8.0 and this Addendum.~~

### G.1 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

The introductory and continuing training programs are designed to prepare personnel to manage and maintain the TSD unit in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain TSD units under normal conditions, the training programs ensure that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is consistent with the description of actions contained in Addendum J, Contingency Plan. The introductory and continuing training programs contain the following objectives:

- Teach ~~Hanford Facility 325 HWTUs~~ personnel to perform their duties in a way that ensures the ~~Hanford Facility 325 HWTUs~~'s compliance with [WAC 173-303](#)
- Teach ~~Hanford Facility 325 HWTUs~~ personnel dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles/positions in which they are employed, and
- Ensure ~~Hanford Facility 325 HWTUs~~ personnel can respond effectively to emergencies.

Introductory training includes general ~~Hanford Facility 325 HWTUs~~ training and TSD unit-specific training. General ~~Hanford Facility 325 HWTUs~~ training is described in ~~Permit Attachment 33, Chapter 8.0 below~~, and is provided in accordance with ~~the Permit Condition II.C.2~~. TSD unit-specific training is provided to ~~Hanford Facility 325 HWTUs~~ personnel allowing those personnel to work unescorted, and in some cases is required for escorted access. ~~Hanford Facility 325 HWTUs~~ personnel cannot perform a task for which they are not properly trained, except to gain required experience while under the direct supervision of a supervisor or coworker who is properly trained. ~~Hanford Facility 325 HWTUs~~ personnel must be trained within 6 months after their employment at or assignment to the ~~Hanford Facility 325 HWTUs~~, or to a new job title/position at the ~~Hanford Facility 325 HWTUs~~, whichever is later.

General Hanford Facility training: Permit Condition II.C.2 requires Hanford Facility personnel to receive general facility training within 6 months of hire. This training provides an orientation on dangerous waste management activities being conducted on the 325 HWTUs and includes the following:

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

**Commented [HT1]:** Rephrased to eliminate wordiness; also, Attachment 33 has been deleted from the Permit. Salient information from former Attachment 33 is added in this modification where necessary. Class 1, A.1. and A.8.

**Commented [HT2]:** Comma is extraneous. Class 1, A.2.

**Commented [HT3]:** Have replaced the phrase "Hanford Facility" as it relates to personnel with "325 HWTUs" throughout this Addendum, since this is a OUG-specific training plan. This does not diminish the responsibility to train "all" "Hanford Facility personnel" per Condition II.C.2 and II.C.4, but this OUG-specific plan is not the vehicle to implement this at PNNL or Hanford. Class 1, A.1.

**Commented [HT4]:** Attachment 33 was deleted, so this info is being added below. Class 1, A.8.

**Commented [HT5]:** Word "the" is extraneous. Class 1, A.2.

1 • Familiarization with the applicable portions of the Hanford Emergency Management Plan (Permit  
2 Attachment 4).

3 PNNL will provide training to all new staff that meets the requirements listed for Permit Condition I.I.C.2.

4 Permit Condition I.I.C.4, requires the Permittees to provide the necessary training to non-Facility  
5 personnel (i.e., visitors, subcontractors) as appropriate for the locations and activities undertaken. At a  
6 minimum, this training describes dangerous waste management hazards on the Hanford Facility. PNNL  
7 will provide this training to non-Facility personnel accessing PNNL-occupied Hanford facilities.

8 Refer to description in Permit Attachment 33, Chapter 8.0:

9 Contingency Plan training: Hanford Facility 325 HWTUs personnel receive training on applicable  
10 portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) in the general  
11 Hanford Facility 325 HWTUs training. In addition, Hanford Facility 325 HWTUs personnel receive  
12 training on the content of the description of actions contained in Addendum J, Contingency Plan to be  
13 able to effectively respond to emergencies.

14 Emergency Coordinator training: Hanford Facility 325 HWTUs personnel who perform emergency  
15 coordinator duties in [WAC 173-303-360](#) (e.g., Building Emergency Director) in the Hanford Incident  
16 Command System receive training on implementation of the contingency plan and fulfilling the position  
17 within the Hanford Incident Command System. These Hanford Facility 325 HWTUs personnel must also  
18 become thoroughly familiar with applicable contingency plan documentation, operations, activities,  
19 location, and properties of all waste handled, location of all records, and the unit/building layout.

20 Operations training: Dangerous waste management operations training (e.g., waste designation training,  
21 shippers training) will be determined on a unit-by-unit basis and shall consider the type of waste  
22 management unit (e.g., container management unit) and the type of activities performed at the waste  
23 management unit (e.g., sampling). For example, training provided for management of dangerous waste in  
24 containers will be different than the training provided for management of dangerous waste in a tank  
25 system. Common training required for compliance within similar waste management units can be  
26 provided in general training and supplemented at the TSD unit. Training provided for TSD unit-specific  
27 operations will be identified in the training plan documentation based on (1) whether a general training  
28 course exists, (2) the training needs to verify waste management unit compliance with [WAC 173-303](#), and  
29 (3) training commitments agreed to with Ecology.

30 **G.1.1 Continuing Training**

31 Continuing training meets the requirements for [WAC 173-303-330\(1\)\(b\)](#) and includes general Hanford  
32 Facility training and TSD unit-specific training.

33 General Hanford Facility training: Annual refresher training is provided for general Hanford Facility 325  
34 HWTUs training. Refer to description in Permit Attachment 33, Chapter 8.0 in Section G.1.

35 Contingency plan training: Annual refresher training is provided for contingency plan training. Refer to  
36 description above in Section G.1.

37 Emergency coordinator training: Annual refresher training is provided for emergency coordinator  
38 training. Refer to description above in Section G.1.

39 Operations training: Refresher training occurs on many frequencies (i.e., annual, every other year, and  
40 every 3 years) for operations training. When justified, some training will not contain a refresher course  
41 and will be identified as a one-time only training course. The TSD unit specific This training plan  
42 documentation will specify specifies the frequency for each training course. Refer to description above in  
43 Section G.1.

**Commented [HT6]:** Copied essentially verbatim from former Attachment 33, Section 8.1.1, "General Hanford Facility Training". Customized to reflect the last two paragraphs as specific PNNL requirements. Class 1, A.1.

**Commented [HT7]:** Content of this training was moved to the section above from Attachment 33 (which has been removed from the Permit). Class 1, A.1.

**Commented [HT8]:** Corrects reference within document. Class 1, A.1.

**Commented [HT9]:** Corrects reference within document. Class 1, A.1.

**Commented [HT10]:** Revises this to reflect the addition of refresher training frequency to Table G.1. No changes are being made to the current refresher periods. Class 1, B.5.b.

**Commented [HT11]:** Corrects reference within document. Class 1, A.1.

1 **G.2 DESCRIPTION OF TRAINING DESIGN**

2 Proper design of a training program verifies that personnel who perform duties on the ~~Hanford~~  
3 ~~Facility~~325 HWTUs related to [WAC 173-303-330\(1\)\(d\)](#) are trained to perform their duties in compliance  
4 with [WAC 173-303](#). Actual job tasks, referred to as duties, are used to determine training requirements.  
5 The first step taken to verify that ~~Hanford Facility~~325 HWTUs personnel have received the proper  
6 training is to determine and document the waste management duties by job title/position. The second step  
7 compares waste management duties to the general waste management unit training curriculum. If the  
8 general waste management unit training curriculum does not address the waste management duties, the  
9 training curriculum is supplemented and/or on-the-job training is provided. The third step summarizes  
10 the content of a training course necessary to verify that the training provided to each job title/position  
11 addresses associated waste management duties. The last step is to assign training curriculum to ~~Hanford~~  
12 ~~Facility~~325 HWTUs personnel based on the previous evaluation. The training plan documentation  
13 contains this process.

14 Waste management duties include those specified in Section G.1 as well as those contained  
15 in [WAC 173-303-330\(1\)\(d\)](#). Training elements of [WAC 173-303-330\(1\)\(d\)](#) applicable to the  
16 325 HWTUs operations include the following:

- 17 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 18 • Communications or alarm systems
- 19 • Response to fires or explosions
- 20 • Shutdown of operations

21 ~~Hanford Facility~~325 HWTUs personnel who perform these duties receive training pertaining to their  
22 duties. The training plan documentation described in Section ~~§G.3~~ contains specific information  
23 regarding the types of training ~~Hanford Facility~~325 HWTUs personnel receive based on the outline in  
24 Section ~~§C.1~~.

Commented [HT12]: Corrects references within document (unfixed typos from prior mod). Class 1, A.2.

25 **G.3 DESCRIPTION OF TRAINING PLAN**

26 In accordance with Permit Condition II.C.3, the ~~unit-specific portion~~325 HWTUs chapter of the *Hanford*  
27 *Facility Dangerous Waste Permit Application* must contain a description of the training plan. The  
28 training plan documentation is maintained outside of the *Hanford Facility Dangerous Waste Part B*  
29 *Permit Application* and the Permit. Therefore, changes made to the training plan documentation are not  
30 subject to the Permit modification process. However, the training plan documentation is prepared to  
31 comply with [WAC 173-303-330\(2\)](#).

Commented [HT13]: Makes this requirement unit-specific and reflects that the unit already has final status. Class 1, A.1.

32 Documentation prepared to meet the training plan consists of hard copy and/or electronic media as  
33 provided by Permit Condition II.C.1. The training plan documentation consists of one or more  
34 documents and/or a training database with all the components identified in the core document.

35 A description of how training plan documentation meets the three items in [WAC 173-303-330\(2\)](#) is as  
36 follows:

- 37 1. [WAC 173-303-330\(2\)\(a\)](#): *The job title, job description, and name of the employee filling each job.*  
38 *The job description must include requisite skills, education, other qualifications, and duties for each*  
39 *position.*

40 Description: The specific ~~Hanford Facility~~325 HWTUs personnel job title/position is correlated to  
41 the waste management duties. Waste management duties relating to [WAC 173-303](#) are correlated to  
42 training courses to verify that training is properly assigned.

43 Only names of ~~Hanford Facility~~325 HWTUs personnel who carry out job duties relating to TSD unit  
44 waste management operations at the ~~331 C Storage Unit~~325 HWTUs are maintained. Names are  
45 maintained within the training plan documentation. A list of ~~Hanford Facility~~325 HWTUs personnel  
46 assigned to the ~~331 C Storage Unit~~325 HWTUs is available upon request.

Commented [HT14]: Corrects typo in reference to unit. Class 1, A.2.

Commented [HT15]: Corrects typo in reference to unit. Class 1, A.2.

Information on requisite skills, education, and other qualifications for job title/positions are addressed by providing a reference where this information is maintained (e.g., human resources). Specific information concerning job title, requisite skills, education, and other qualifications for personnel is found in the training plan documentation and can be provided upon request.

Commented [HT16]: Specifies location of this information. Class 1, B.5.b.

- 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 the training plan documentation. The type and amount of introductory and continuing training is specified in the training plan documentation as shown in Table G.1.

Commented [HT17]: Retraining frequency added to Table G.1 per current Ecology requirements. No change in frequency from current practice. Class 1, B.5.b.

- WAC 173-303-330(2)(c): Records documenting that 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, PNNL will maintain documentation in accordance with WAC 173-303-330(2) and (3). Training records may be maintained in hard copy form or by using electronic data storage. At a minimum, training records will consist of course attendance rosters correlating the training received with the personnel who were in attendance. 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 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 DOE or contractor program. Training records are maintained consistent with Permit Attachment 33, Chapter 8.0.

Commented [HT18]: Imports Section 8.4 of former Attachment 33 (formerly referenced here) to provide completeness. First two sentences edited to make them specific to 325 HWTUs. Class 1, A.1.

Table G.1. 325 HWTUs Training Matrix

Attachment 33, General Information Portion, Chapter 8.0 Training Category	Training Category*					
	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training		
325 HWTUs	Orientation Program	Building Emergency Plan	Building Emergency Director Training	Advanced Waste Management Training	Container Management	Tank System Management
<b>Staff Position</b>						
Waste Operations Manager	X	X	X <sup>3</sup>	X	X	X <sup>3</sup>
Waste Operations Staff	X	X	X <sup>2</sup>	X	X	X <sup>2</sup>
Shielded Analytical Laboratories Staff	X	X	X <sup>3</sup>	X	X	X <sup>3</sup>

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Description of Training Course <sup>1</sup>	Training Category <sup>2</sup>	Retrain Frequency <sup>3</sup>	Staff Position		
			Waste Operations Manager	Waste Operations Staff	Hot Cell Operations Staff
Safety and Health Training	GHFT	Annual	X	X	X

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<sup>1</sup> Refer to the 325 HWTUs Training Plan for a complete description of coursework in each training category.

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<sup>2</sup> GHFT – General Hanford Facility Training; CPT – Contingency Plan Training; ECT – Emergency Coordinator Training; OT – Operations Training. See Section G.1.1 for description of these categories.

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<sup>3</sup> All courses required initially with refreshers administered as noted in this column.

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Class 1-3 Modification  
 March 31, 2009 May 2014

WA7 89000 8967, Part III, Operating Unit 5  
 325 Hazardous Waste Treatment Units

<u>Building Emergency Procedure</u>	<u>CPT</u>	<u>Annual</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Building Emergency Director Training</u>	<u>ECT</u>	<u>Annual</u>	<u>X<sup>4</sup></u>	<u>X<sup>4</sup></u>	<u>X<sup>4</sup></u>
<u>Advanced Waste Management Training</u>	<u>OT</u>	<u>Annual</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Container Management</u>	<u>OT</u>	<u>When Revised<sup>5</sup></u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Tank System Management</u>	<u>OT</u>	<u>When Revised<sup>5</sup></u>	<u>X</u>	<u>X</u>	<u>X</u>

- 1 <sup>3</sup> Required for any staff that has been assigned these duties
- 2 \* Refer to the 325 HWTUs Training Plan for a complete description of coursework in each training category.

**Commented [HT19]:** Table reformatted to place training courses on the vertical axis and job positions on the horizontal axis. Added retraining frequency for each type of training. Changed "SAL Staff" to "Hot Cell Operations Staff" to be inclusive of HLRF (Cask Handling Area and Truck Lock) staff. Format follows that proposed by RL/CHPRC for CWC-WRAP unit training addendum. No change to frequency or staff affected by the plan. Class 1, B.5.b.

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<sup>4</sup> Limited to unit staff assigned these duties.  
<sup>5</sup> Reading Assignment: Staff re-read the procedure(s) included in this category whenever they are revised (including minor revisions).

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