AMWTP HWMA/RCRA PERMIT

FOR THE

IDAHO NATIONAL LABORATORY

ATTACHMENT 5

Section H

Training Plan

Revision Date: October 18, 2019
# TABLE OF CONTENTS

## ATTACHMENT 5

### TRAINING PLAN

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>H-1</td>
<td>Outline of the Training Plan</td>
<td>1</td>
</tr>
<tr>
<td>H-1a</td>
<td>Job Title/Job Description</td>
<td>1</td>
</tr>
<tr>
<td>H-1b</td>
<td>Training Plan Content and Scheduling</td>
<td>2</td>
</tr>
<tr>
<td>H-1c</td>
<td>Training Manager</td>
<td>3</td>
</tr>
<tr>
<td>H-1d</td>
<td>Relevance of Training to Job Position</td>
<td>4</td>
</tr>
<tr>
<td>H-1e</td>
<td>Training for Emergency Response</td>
<td>5</td>
</tr>
<tr>
<td>H-2</td>
<td>Implementation of the Training Plan</td>
<td>5</td>
</tr>
</tbody>
</table>
H. TRAINING PLAN

H-1 Outline of the Training Plan [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR 264.16(a)(1) and 270.14(b)(12)]

This section describes the Training Plan for AMWTP personnel who work at the MWMUs. The Training Plan assists AMWTP personnel in performing their assigned duties in a safe manner, and it includes the required introductory and continuing training. Training is given to personnel responsible for management of MW to cover the various tasks and responsibilities of AMWTP personnel. Successful implementation of the Training Plan enhances the overall safety program and contributes to safe operations involving MW at the MWMUs. The Training Plan satisfies the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR 1910.120(p) [Hazardous Waste Operations and Emergency Response (HAZWOPER)].

Personnel involved in MW handling, management, and operations at the MWMUs participate in a comprehensive training program per this Training Plan. In general, these employees receive training on operations, proper handling and management of MW, emergency response procedures, and other HWMA/RCRA-related topics.

The following section outlines the Training Plan for employees involved in MW management, handling, or operations at the MWMUs. The training consists of a combination of self-study, classroom instruction, computer-based training, and on-the-job training (OJT) in conjunction with qualification programs. Qualified personnel who have expertise in the subject provide the OJT.

H-1a Job Title/Job Description [IDAPA 58.01.05.008; 40 CFR 264.16(d)(1) and (d)(2)]

The following documents are kept as part of the Operating Record:

- The job title and position description, including requisite skills, education, qualifications, and duties for each position related to the management of MW and the names of the employee filling each job;
- Written descriptions of the type and amount of both introductory and continuing training required by each person filling a job position involved with the management of MW at the MWMUs; and
- Training records that document training and qualifications for AMWTP personnel involved with management of MW.
H-1b Training Plan Content and Scheduling [IDAPA 58.01.05.008; 40 CFR 264.16(c) and 264.16(d)(3)]

The Manager, or designee, ensures all AMWTP personnel working at the MWMUs are appropriately trained prior to initiating any work that may cause the employee to be potentially exposed to MW. The Training Manager, or designee, with assistance from management, is responsible for the scheduling and completion of all required training. All AMWTP personnel directly involved with activities at the MWMUs receive Facility Access training. Facility Access training is designed to familiarize all employees with the information and protocols necessary to maintain a safe work environment within the MWMUs. Facility Access orientation covers:

- General description of the MWMUs,
- Waste management activities performed in the MWMUs,
- Contingency Plan contents,
- MWMU access and security requirements, and
- Hazards associated with the AMWTP MWMUs.

The Contingency Plan training addresses emergency equipment use, availability, and location; alarms, evacuation procedures and routes; and other relevant emergency procedures.

AMWTP personnel receive annual HWMA/RCRA facility training. This training is conducted to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, emergency systems, and other relevant topics.

AMWTP personnel working at the MWMUs also receive additional training if their job involves potential exposure to MW. These workers receive HAZWOPER training for TSD facilities (24 hr-initial, 8-hr refresher), as specified in 29 CFR 1910.120(p).

In addition, some AMWTP personnel involved in MW operations, described at 29 CFR 1910.120(p), may receive training in:

- respirator use and fit test,
- radiation worker training,
- first aid, and
- cardiopulmonary resuscitation (CPR).
AMWTP personnel in craft occupations and certain technicians receive specialized training in the areas applicable to their job assignments. This training may be required for acquiring and maintaining certification in their trade, or validating proficiency to perform certain tasks. Certification/proficiency training may be required for personnel responsible for such duties as fitters, mechanics, electricians, equipment operators, instrument technicians, vehicle technicians, and waste handling operators.

Personnel may be given written and/or oral examinations, operational walk-throughs, and reviews to ensure that they are adequately trained commensurate to their job positions. Examinations and evaluations meet performance-based training criteria. Results of examinations, walk-throughs, and reviews are documented. Completed checklists, examinations, and walk-throughs are placed in each individual's training record.

Occasionally, AMWTP personnel attend training classes conducted by outside vendors. In order to verify personnel attendance at such a course, a copy of the class certification or other documentation is maintained in the Training Record.

H-1c Training Manager [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]

The AMWTP Training Manager, or designee, is responsible for fulfilling the requirements of the Training Manager as specified at IDAPA 58.01.05.008 [40 CFR 264.16(a)(2)]. The Training Manager, or designee, is responsible for ensuring that personnel at the AMWTP are trained in programs and procedures for management of MW, environmental requirements, industrial and radiation safety, Contingency Plan, operational skills, and technical training.

The Training Manager, or designee, is responsible for the development and approval of the training courses provided to AMWTP employees. The Training Manager, or designee, reviews lesson plans and instructor’s qualifications to validate the acceptance of the training course. The Training Manager, or designated trainers, are qualified to instruct AMWTP personnel about the subject matter presented in training. Such trainers have academic credentials and/or the instructional experience necessary for teaching the subject(s).

The Training Manager, or designee, in cooperation with the HWMA unit manager who is trained in Hazardous Waste Management procedures, ensures that MW management training
(including training on the implementation of the Contingency Plan) is provided to the AMWTP personnel who are working at the MWMUs and that the training is relevant to the assigned positions. In addition, the Training Manager, or designee, provides overall leadership and management direction to the AMWTP training organization. The Training Manager’s, or designee’s, duties include the following:

- Provide direction to the training organization,
- Ensure training personnel performance is evaluated,
- Provide direction for and approve the AMWTP Training Plan,
- Ensure AMWTP personnel receive training appropriate to their positions,
- Ensure all program objectives and requirements are satisfied, and
- Ensure the Training Plan meets the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR 1910.120.

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

Individual Training Plans (ITPs) are prepared for each AMWTP position description that requires a formal Training Plan. Each ITP serves as a training guide to identify the minimum requirements for achieving and maintaining required qualifications and certifications. The ITP also serves as a checklist to ensure training record completeness. Training requirements for each position are maintained in the Training Database.

At a minimum, each ITP identifies the following:

- Qualifications, and
- Training requirements.

ITPs identify typical qualification and certification requirements. Some positions may require specialized training (e.g., HWMA/RCRA Secondary Containment System Repair Procedure, Container Repair Procedure, fire watch, processing waste containing potentially pyrophoric radionuclides, etc.). Special-case training is documented in the training records.

ITPs include requirements for hazardous and MW management and emergency response training. The AMWTP Training Manager, Operations Manager, or designee, is responsible for monitoring the status of personnel qualifications and certifications.
Persons who have the responsibility for evaluating training requirements for AMWTP personnel include, but are not limited to, the AMWTP Training Manager, or designee, and the appropriate supervisor or manager.

Individuals who demonstrate an equivalency for specific requirements or prerequisites identified in the ITP may be exempted from the associated training. The Training Manager, or designee, consults with the employee’s manager/supervisor to review the claim for exemption or completion of equivalent training prior to approving the exemption or equivalency. Each exemption/equivalency is granted in writing and documented in the individual's training record.

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

Emergency response training is provided to all AMWTP personnel who work at the AMWTP, including specialized training for the AMWTP Emergency Response Organization (ERO). AMWTP Emergency Coordinators who assume responsibility for emergency response at ARP facilities, especially during off hours, will receive ARP-specific training. All personnel requiring unescorted access to the AMWTP receive training on the appropriate response to take when a fire, explosion, or release of MW is occurring or imminent at the MWMUs. This training provides instructions on controlling or responding to the incident and safe evacuation from the building/area. The Training Plan includes the following, as applicable:

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment;
- Use of communications or alarm systems;
- Response to fires or explosions; and
- Shutdown of operations.

Documentation that AMWTP personnel working at the MWMUs have received initial emergency response training, annual training, and specialized training is maintained in their training records.

**H-2 Implementation of the Training Plan [IDAPA 58.01.05.008; 40 CFR 264.16(b), 264.16(d)(4), and 264.16(e)]**

In conjunction with AMWTP Facility Access training, designated employees enter a qualification or certification program specific to their job assignments. AMWTP personnel holding qualifications and certifications are retrained or evaluated so they may retain their
qualifications or certifications. Job assignments, which require the completion of a qualification
or certification program, have time requirements associated with the Training Plan.

Initial training requirements are completed within six months of the individual's date of
employment or assignment to a MWMU work location when their position involves the
management of MW. Employees do not work in unsupervised positions involving MW until
they have completed the minimum specified training requirements.

Training files include documentation of completed training, such as class rosters, signed
checklists, completed exams, data base printouts, and other documents verifying training. For
training provided by organizations external to the AMWTP, the original training records are
typically maintained by the presenting organizations, and a copy of corresponding records is
provided to the AMWTP Training Manager, or designee. This information is entered into the
individual's training record.

A training record includes the person’s name, identification number, job title/position,
and associated training documentation. Each training file includes the person’s individual
training plan, which identifies the minimum required introductory and continuing training.

Training records for AMWTP personnel are maintained as part of the Operating Record
per IDAPA 58.01.05.008 (40 CFR 264.73).