

AMWTP HWM/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

H. TRAINING PLAN.....1

 H-1 Outline of the Training Plan.....1

 H-1a Job Title/Job Description1

 H-1b Training Plan Content and Scheduling.....2

 H-1c Training Manager3

 H-1d Relevance of Training to Job Position4

 H-1e Training for Emergency Response5

 H-2 Implementation of the Training Plan5

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.

1 **H-1b Training Plan Content and Scheduling [IDAPA 58.01.05.008;**
2 **40 CFR 264.16(c) and 264.16(d)(3)]**

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

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

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

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

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

24 In addition, some AMWTP personnel involved in MW operations, described at
25 29 CFR 1910.120(p), may receive training in:

- 26 • respirator use and fit test,
- 27 • radiation worker training,
- 28 • first aid, and
- 29 • cardiopulmonary resuscitation (CPR).

1 AMWTP personnel in craft occupations and certain technicians receive specialized
2 training in the areas applicable to their job assignments. This training may be required for
3 acquiring and maintaining certification in their trade, or validating proficiency to perform certain
4 tasks. Certification/proficiency training may be required for personnel responsible for such
5 duties as fitters, mechanics, electricians, equipment operators, instrument technicians, vehicle
6 technicians, and waste handling operators.

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

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

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

16 The AMWTP Training Manager, or designee, is responsible for fulfilling the
17 requirements of the Training Manager as specified at IDAPA 58.01.05.008 [40 CFR
18 264.16(a)(2)]. The Training Manager, or designee, is responsible for ensuring that personnel at
19 the AMWTP are trained in programs and procedures for management of MW, environmental
20 requirements, industrial and radiation safety, Contingency Plan, operational skills, and technical
21 training.

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

28 The Training Manager, or designee, in cooperation with the HWMA unit manager who is
29 trained in Hazardous Waste Management procedures, ensures that MW management training

1 (including training on the implementation of the Contingency Plan) is provided to the AMWTP
2 personnel who are working at the MWMUs and that the training is relevant to the assigned
3 positions. In addition, the Training Manager, or designee, provides overall leadership and
4 management direction to the AMWTP training organization. The Training Manager's, or
5 designee's, duties include the following:

- 6 • Provide direction to the training organization,
- 7 • Ensure training personnel performance is evaluated,
- 8 • Provide direction for and approve the AMWTP Training Plan,
- 9 • Ensure AMWTP personnel receive training appropriate to their positions,
- 10 • Ensure all program objectives and requirements are satisfied, and
- 11 • Ensure the Training Plan meets the requirements of IDAPA 58.01.05.008
12 (40 CFR 264.16) and 29 CFR 1910.120.

13 **H-1d Relevance of Training to Job Position [IDAPA 58.01.05.008;**
14 **40 CFR 264.16(a)(2)]**

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

20 At a minimum, each ITP identifies the following:

- 21 • Qualifications, and
- 22 • Training requirements.

23 ITPs identify typical qualification and certification requirements. Some positions may
24 require specialized training (e.g., HWMA/RCRA Secondary Containment System Repair
25 Procedure, Container Repair Procedure, fire watch, processing waste containing potentially
26 pyrophoric radionuclides, etc.). Special-case training is documented in the training records.
27 ITPs include requirements for hazardous and MW management and emergency response
28 training. The AMWTP Training Manager, Operations Manager, or designee, is responsible for
29 monitoring the status of personnel qualifications and certifications.

1 Persons who have the responsibility for evaluating training requirements for AMWTP
2 personnel include, but are not limited to, the AMWTP Training Manager, or designee, and the
3 appropriate supervisor or manager.

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

9 **H-1e Training for Emergency Response [IDAPA 58.01.05.008;**
10 **40 CFR 264.16(a)(3)]**

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

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

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

27 **H-2 Implementation of the Training Plan [IDAPA 58.01.05.008; 40 CFR 264.16(b),**
28 **264.16(d)(4), and 264.16(e)]**

29 In conjunction with AMWTP Facility Access training, designated employees enter a
30 qualification or certification program specific to their job assignments. AMWTP personnel
31 holding qualifications and certifications are retrained or evaluated so they may retain their

1 qualifications or certifications. Job assignments, which require the completion of a qualification
2 or certification program, have time requirements associated with the Training Plan.

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

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

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

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