

RCRA PART B PERMIT  
FOR THE  
IDAHO NATIONAL LABORATORY

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Idaho Nuclear Technology and Engineering Center  
Calcined Solids Storage Facility

Attachment 5 - Section H  
Personnel Training

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## H. PERSONNEL TRAINING

1           This section outlines and describes the core-training program for personnel involved in the  
2 management of hazardous and mixed waste at treatment, storage, and disposal (TSD) units at the Idaho  
3 Nuclear Technology and Engineering Center (INTEC), including units addressed in this permit.

4           A training program has been implemented to ensure that personnel involved in the management  
5 of hazardous and mixed waste at INTEC TSD units receive training consistent with the requirements of  
6 IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR Parts 264.16 and 270.14). The training program is  
7 designed to ensure that personnel are trained to hazardous waste management procedures including, but  
8 not limited to, inspections, normal operations, emergency procedures, equipment, systems, and  
9 contingency plan implementation. Duties performed at the TSD units will be performed in a safe,  
10 disciplined, and professional manner.

### **H-1. Outline of Training Program [IDAPA 58.01.05.008 and 58.01.05.012; 40 CFR 264.16(a)(1) and 270.14(b)(12)]**

11           Training programs are developed using a systematic approach to training (SAT). The SAT process  
12 involves:

- 13       • Analyzing tasks to determine the training requirements
- 14       • Designing a plan to satisfy the training requirements
- 15       • Developing plans and all supporting training materials
- 16       • Implementing the training plans
- 17       • Evaluating the effectiveness of the training and making recommendations for changes.

18           The SAT process is used to determine the training requirement for each task listed in Table H-1.  
19 The training program for TSD unit personnel involves a combination of formal [classroom, group  
20 instruction, on-the-job training (OJT), etc.] and informal training sessions (one-on-one instruction,  
21 required reading, etc.). The training requirements, lesson plans, and OJT guides for each task and  
22 position are identified in Table H-1.

23           Programs prepared by the TSD training organization provide the core requirements to be  
24 completed by the individual during training. As the program is satisfactorily completed, it is verified and  
25 documented in their training records.

1           The training program is upgraded as needed in response to changes in job descriptions, job  
2 reassignment, process or procedural changes, technological changes, or implementation of new regulatory  
3 requirements that affect TSD unit operations. Training program revisions for specific TSD units are  
4 approved by the training director and the job analysis data is updated to reflect the changes in the training  
5 requirements.

6           TSD unit management works with subject matter experts to identify personnel training  
7 requirements. The TSD unit training organization (1) schedules and/or provides the training, (2) revises  
8 and updates training material as needed, and (3) maintains training documentation. The TSD unit training  
9 organization maintains individual training records for TSD unit employees.

### **H-1a. Job Tasks [IDAPA 58.01.05.008; 40 CFR 264.16(d)(1), 264.16(d)(2)]**

10           The job tasks for personnel involved with hazardous waste management at INTEC TSD units are  
11 included in Table H-1 “Minimum Training Matrix for TSD unit Personnel.” Personnel are trained to  
12 those sections of the permit, which are pertinent to their specific job assignments.

13           Security Guards – The Security personnel are not stationed at the permitted units nor are they  
14 involved in the management or handling of the waste. Security personnel receive training from the  
15 security organization relative to their positions and the facilities they serve. Therefore, training of  
16 security personnel is not discussed further in this section.

17           On Scene Commander – is the Idaho National Engineering and Environmental Laboratory (INL)  
18 Fire Department Chief. The INL firefighters serve the INL in fighting fires and containing major spills,  
19 including spills of waste from waste management units. The INL Fire Department conducts a self-  
20 contained training program for their personnel, which includes procedures for handling fires and spill  
21 emergencies involving hazardous materials and hazardous mixed waste at the INL. Therefore, training of  
22 firefighters is not discussed further in this section.

23           Emergency Director – is trained on the INL (Site wide) Emergency Plan/Resource Conservation  
24 and Recovery Act (RCRA) Contingency Plan or Industrial Safety and Hygiene Program as part of his/her  
25 duties. The ED will be informed by the Emergency Action Manager (EAM) or facility personnel at  
26 INTEC. Therefore, training of the ED is not discussed further in this section.

## **H-1b. Training Content, Frequency, and Techniques [IDAPA 58.01.05.008; 40 CFR 264.16 and (d)(3)]**

1           The TSD unit training program consists of a combination of classroom instruction and OJT.  
2           Additionally, TSD unit employees receive new employee orientation and training. Employees working at  
3           or assigned as part-time/frequent visitor to Site facilities are required to complete annual facility access  
4           training and general employee radiation training (GERT) unless they are currently trained as radiation  
5           workers.

6           The initial training includes a general orientation of INL and TSD unit procedures, including  
7           evacuation and alert procedures, training requirements, and emergency equipment locations. The initial  
8           training provides TSD unit personnel with training commensurate with their job assignments in the  
9           following areas:

- 10       •       General description of the INTEC
- 11       •       Job-related procedures, policies, and instructions
- 12       •       Radiological health and safety program
- 13       •       Fire protection program
- 14       •       Hazards associated with the TSD unit.

15           RCRA training is conducted annually for INTEC TSD unit employees to address changes that  
16           have occurred, including such topics as permit status, permit requirements, contingency and inspection  
17           plan implementation, and hazardous waste management procedures for the TSD unit(s) to which they are  
18           assigned.

19           The following major knowledge areas are included and evaluated based on job position and  
20           formal criteria identified in the job analysis:

- 21       •       RCRA requirements as they relate to INTEC unit operations
- 22       •       Hazardous materials
- 23       •       INTEC TSD unit systems and components (including waste treatment processes and operations)
- 24       •       Normal operating procedures and shutdown procedures
- 25       •       Emergency or off-normal operating procedures
- 26       •       Inspections and equipment maintenance

- 1 • Occupational Safety and Health Administration (OSHA) and related health and safety  
2 requirements
- 3 • INTEC TSD unit and operational/administrative procedures.

4 Personnel whose qualifications have been verified before beginning work perform TSD unit  
5 operation and maintenance.

6 Employees may be given written and/or oral examinations, operational evaluations, and reviews  
7 to ensure that they are adequately trained relative to their job tasks. Results of examinations, written or  
8 oral evaluations, and reviews are documented. All completed qualification standards, checklists,  
9 examinations, written evaluations, and documented oral evaluations are maintained in each individual's  
10 training record.

11 Table H-1 shows the task training requirements for TSD unit personnel involved in  
12 hazardous/mixed waste operations at INTEC TSD units addressed in this permit. TSD unit personnel  
13 may receive additional training beyond that shown in Table H-1. This training is documented and  
14 included in employee training records.

15 Occasionally, TSD unit personnel attend training classes conducted external to the INL or  
16 conducted at the INL by non-INL subcontract personnel. In order to verify an employee's attendance at  
17 these training courses, a copy of the class certification or other documentation is maintained in the  
18 individual's training record.

### **H-1c. Training Director [IDAPA 58.01.05.008; 40 CFR 264.16(a)(2)]**

19 For all TSD units the training director functions in conjunction with his/her designee(s) to insure  
20 that all segments and responsibilities associated with the training program are accomplished. The training  
21 director provides overall leadership and management direction to the TSD unit training organization. The  
22 director's duties include the following:

- 23 • Provide direction to the TSD unit training organization
- 24 • Ensure that performance of training personnel is evaluated

**Table H-1.** Minimum training matrix for TSD unit personnel.

Task	Audience	Initial Employee Training	Rad Training <sup>1</sup>	24 hour OSHA <sup>1</sup>	Annual Training	Applicable Sections of RCRA Permit <sup>2</sup>
High-level waste (HLW) operations personnel that perform TSDF operations, or supervise those operations, and are exposed to the hazards of the TSDF. These employees have duties that may bring them into contact with hazardous/mixed waste. Therefore, these employees are required to complete 24-hr HAZWOPER Qualification.	HLW TSDF Worker	X	X	X	X	C, D, F, G
HLW operations personnel that perform TSDF operations, or provide system-specific operational direction (i.e., facility operations managers, facility system engineers, facility environmental representatives). These employees are not directly exposed to the hazards of the TSDF but must be cognizant of the RCRA-related requirements for HLW (for instance, these employees are not required to wear personal protective equipment (PPE) and are not required to complete 24-hr HAZWOPER).	HLW Incidental TSDF Worker	X	X		X	C, D, F, G
Employees who enter TSDF areas unescorted and provide support functions that may bring them into contact with hazardous/mixed waste at the TSDF. These employees are required to complete 24-hr HAZWOPER Qualification. Examples of work activities include radiological surveys, maintenance planning, life safety systems, and surveillance. Examples of workers that may be included are Crafts, Radcon, Quality Inspector or Technicians, Facility Engineers, Life Safety System Engineers, EAMs, Waste Handlers, and Subcontractors. (In the HLW facilities, the TSDF boundary is usually interpreted to mean within the Radiological Buffer Areas).	INTEC TSDF Support Worker	X	X	X	X	F, G
Employees who enter TSDF areas unescorted and provide support functions and <b>are not</b> directly exposed to the hazards of the TSDF (for instance, these employees are not required to wear PPE and are not required to complete 24-hr HAZWOPER). Examples of workers that may be included are Environmental, Safety, and Health (ES&H) Support Engineers, Hygienists, Support Engineers, Planners, Senior Supervisory Watch (SSW), and Quality Engineers. (In the HLW facilities, the TSDF boundary is usually interpreted to mean within the Radiological Buffer Areas).	INTEC TSDF Incidental Support Worker	X	X		X	F, G

**Table H-1. Continued**

Task	Audience	Initial Employee Training	Rad Training <sup>1</sup>	24 hour OSHA <sup>1</sup>	Annual Training	Applicable Sections of RCRA Permit <sup>2</sup>
Employees who perform Decon facility cell inspections and debris treatment activities. Decon personnel that perform TSDF operations, or supervise those operations, and are exposed to the hazards of the TSDF. These employees have duties that may bring them into contact with hazardous/mixed waste. Therefore, these employees are required to complete 24-hr HAZWOPER Qualification.	HLW Decon Technician, HLW Decon Tech Leads	X	X	X	X	C, D, F, G
Waste Disposition Services Technical Staff who perform support functions for TSDFs. These employees have duties that may bring them into contact with hazardous/mixed waste. Therefore, these employees are required to complete 24-hr HAZWOPER Qualification.	WDS TSDF Worker	X	X	X	X	C, D, F, G
1. Personnel who are not exposed to the hazards of the regulated units may not require this training 2. Personnel receive training related to the permit section as appropriate to their job function.						
Section C- Waste Characterization Section D – Process Information			Section F – Procedures to Prevent Hazards Section G – Preparedness, Prevention, and Contingency Plan			

- 1 • Approve TSD unit training program
- 2 • Ensure that all program objectives and requirements are satisfied and that the training program
- 3 meets the requirements of IDAPA 58.01.05.008 (40 CFR 264.16) and 29 CFR 1910.120.

4 The training director or his/her designee(s) is responsible for ensuring that TSD unit personnel  
5 are trained in waste management and contingency plan implementation, including emergency procedures,  
6 and that they receive training appropriate to their tasks. The training director also reviews documentation,  
7 including feedback from audits and appraisals, operating logs, emergency exercise critiques, and  
8 employee recommendations, for possible inclusion into the TSD unit training programs.

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

9 Individual training program profiles are prepared for each TSD unit position that requires a  
10 formal training program.

11 At a minimum, each individual training program profile identifies the following:

- 12 • Job description
- 13 • Qualifications
- 14 • Training requirements.

15 Profiles typically identify qualification requirements. Occasionally, a position may require  
16 specialized training. Special-case training is documented in individual training records. Profiles include  
17 requirements for hazardous/mixed waste management or handling and emergency response training.

18 Supervisors have the responsibility for evaluating training requirements for TSD employees.  
19 These supervisors receive additional training in how to conduct and evaluate OJT.

20 Individuals who demonstrate an equivalency for specific requirements or prerequisites identified  
21 in the training profile may be exempted from requirements in accordance with established procedures.  
22 The training director must approve exemptions/equivalencies. Each exemption/equivalency is granted in  
23 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)]**

1           Emergency response training is provided to all personnel assigned to or associated with TSD  
2 units, including specialized training for employees with specific emergency action responsibilities, such  
3 as the EAM and Emergency Response Organization (ERO) personnel. The following presents an  
4 overview of the emergency response training.

5           General emergency response training of TSD unit ERO personnel includes training on the INL  
6 EP/RCRA CP that covers the following topics:

- 7       •     Spill Control Plan
- 8       •     Evacuation/accountability
- 9       •     Emergency drill/exercise
- 10      •     RCRA
- 11      •     Emergency Plan Implementing Procedures
- 12      •     Emergency preparedness
- 13      •     Incident command system
- 14      •     Inspection and repair of facility emergency monitoring equipment.

15           ERO members respond to emergency events. ERO members receive initial training and annual  
16 requalification training, in addition to training provided to general employees. Training of ERO members  
17 is outlined by position in company procedures. All INTEC employees receive general employee  
18 emergency response action training.

## **H-2. Implementation of Training Program [IDAPA 58.01.05.008; 40 CFR 264.16(b) and 40 CFR 264.16(c)]**

19           After completion of new employee orientation, designated employees enter a training program  
20 specific to their job assignment. Persons holding qualifications are retrained and reevaluated as mandated  
21 by procedures. Job assignments required for the completion of a training program have time and  
22 performance limitations that must be satisfied to meet program qualification criteria.

1 RCRA training is completed within the first six months of the individual's employment or  
2 assignment, and at least annually thereafter, for positions involving TSD unit operations. Throughout the  
3 training program and until completion, employees do not perform their job duties unsupervised.

### **H-3. Training Records [IDAPA 58.01.05.008; 40 CFR 264.16(d)(4) and (e)]**

4 Individual training records are maintained for personnel assigned to TSD units. Training records  
5 include documentation of completed training, such as class rosters, signed checklists, completed exams,  
6 database printouts from additional training classes attended, and other documents verifying training. The  
7 original training records are maintained by the presenting organizations, which enter course completion  
8 information into a database. A hard copy of this information is also entered into the individual's training  
9 record.

10 The training records include the names of employees filling each TSD unit position. Job tasks  
11 and associated training requirements for each TSD unit are found in Table H-1.

12 Individual training records include, as a minimum, the following:

- 13 • Initial training and retraining programs
- 14 • Attendance records of training received
- 15 • Results of exams, walk through, and job performance assessments related to certification.

16 Training records for current employees at each TSD unit are maintained until closure of the unit  
17 or the employee terminates or transfers to a non-TSD unit position. The training records of terminating  
18 employees are maintained at the TSD unit for a minimum of three years from the date the employee last  
19 worked at a TSD unit. The training records for TSD unit employees who transfer to a non-TSD unit  
20 position within the company are forwarded to the employee's new organization, where they continue to be  
21 available for at least three years.