



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

SEP 30 2019

19-AMRP-0082

Ms. Alexandra K. Smith, Program Manager  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Smith:

SUBMITTAL OF SUPPLEMENTAL INFORMATION TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT RENEWAL (REVISION 9) APPLICATION FOR THE 241-CX TANK SYSTEM, CLOSURE UNIT GROUP (CUG) 15, B PLANT COMPLEX, CUG-24, HEXONE STORAGE AND TREATMENT FACILITY (STF), CUG-19, PLUTONIUM-URANIUM EXTRACTION (PUREX) PLANT, CUG-25, ADDENDUM G, "PERSONNEL TRAINING"

The U.S. Department of Energy Richland Operations Office (herein after referred to as the Permittee) submits the 241-CX Tank System, CUG-15, B Plant Complex, CUG-24, Hexone STF, CUG-19, PUREX Plant, CUG-25, Addendum G, "Personnel Training" with certification statement, pursuant to the Washington Administrative Code (WAC) WAC 173-303-840(1)(b) to support the Hanford Facility RCRA Permit, Revision 9, renewal. The purpose of this action is to clarify, modify, or supplement information previously submitted.

The Permittee has worked with your office on the content of "Personnel Training" which represents the Permittee's intent to operate pursuant to Revision 9 of the Hanford Facility RCRA Permit upon the effective date of the permit. This supplemental information may not reflect current facility configurations and /or applicable permit conditions enforceable under the Hanford Facility RCRA Permit Revisions 8C. In accordance with WAC 173-303-806(7), the Permittees will comply with the Revision 8C of the Hanford Facility RCRA Permit until the effective date of Revision 9 of the Hanford Facility RCRA Permit.

SEP 30 2019

If you have any questions, please contact me or your staff may contact Bill Hamel, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,



Brian T. Vance  
Manager

AMRP:DBC

Attachments:

1. Certification for 241-CX Tank System, CUG-15, Addendum G, "Personnel Training"
2. Certification for B Plant Complex, CUG-24, Addendum G, "Personnel Training"
3. Certification for Hexone STF, CUG-19, Addendum G, "Personnel Training"
4. Certification for PUREX Plant, CUG-25, Addendum G, "Personnel Training"
5. 241-CX Tank System, CUG-15, Addendum G, "Personnel Training"
6. B Plant Complex, CUG-24, Addendum G, "Personnel Training"
7. Hexone STF, CUG-19, Addendum G, "Personnel Training"
8. PUREX Plant, CUG-25, Addendum G, "Personnel Training"

cc w/attachs:

J. L. Cantu, Ecology  
D. R. Einan, EPA  
N. M. Menard, Ecology  
M. Pakula, Ecology  
D. Thompson, Ecology  
Administrative Record (TSDs: S-2-1, S-2-2, S-2-9, TS-2-3 and TS-2-6)  
Ecology NWP Library  
Environmental Portal  
HF Operating Record (J. K. Perry, MSA)

cc w/o attachs:

D. B. Bartus, EPA  
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R. Buck, Wanapum  
L. Contreras, YN  
R. E. Day, CHPRC  
M. Johnson, CTUIR

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# 241-CX Tank System Closure Unit Group 15 (CUG-15), Addendum G, "Personnel Training"

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy  
under Contract DE-AC06-08RL14788

**CH2MHILL**  
Plateau Remediation Company

**P.O. Box 1600  
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## 241-CX Tank System Closure Unit Group 15 (CUG-15), Addendum G, "Personnel Training"

Document Type: RPT      Program/Project: CPRM

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Assistant Secretary for Environmental Management

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**APPROVED**

*By Lynn M. Ayers at 12:41 pm, Sep 19, 2019*

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Release Approval

Date

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**Certification**  
**for**  
**Supporting Permit Application Material for "Part V – Closure Units '241-CX Tank System Closure Unit Group 15 (CUG-15)'," Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

---

Brian T. Vance, Manager  
Owner/Operator  
U.S. Department of Energy  
Richland Operations Office

  
\_\_\_\_\_  
Signature

*9/28/19*  
\_\_\_\_\_  
Date

**Certification  
for  
Supporting Permit Application Material for "Part V – Closure Units '241-CX Tank  
System Closure Unit Group 15 (CUG-15)'," Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

\_\_\_\_\_  
L. Ty Blackford, President and CEO  
Co-Operator  
CHPRC  
Richland, Washington

  
Signature

\_\_\_\_\_  
9/29/19  
Date

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## Addendum G

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### Personnel Training

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## Contents

<b>G1</b>	<b>Introduction.....</b>	<b>G-1</b>
	G1.1 Introductory and Continuing Training Program.....	G-1
	G1.1.1 Introductory Training .....	G-1
	G1.1.2 Continuing Training .....	G-6
<b>G2</b>	<b>Description of Training Program .....</b>	<b>G-6</b>
	G2.1 Qualification of Staff (Including On-the-Job Training) .....	G-8
	G2.1.1 Review of the Training Program .....	G-9
<b>G3</b>	<b>Description of Training Plan.....</b>	<b>G-9</b>

## Tables

Table G-1.	Personnel Training.....	G-2
Table G-2.	241-CX Tank System Job Description .....	G-6

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## 1 G1 Introduction

2 This addendum discusses personnel training requirements based on [WAC 173-303](#), “Dangerous Waste  
3 Regulations”; and WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*  
4 (hereinafter referred to as the Hanford Facility RCRA Permit) for the 241-CX Tank System.

5 Permittees will comply with the training outlined in Table G-1, which provides the training requirements  
6 for Hanford Facility personnel associated with dangerous and/or mixed waste management activities at  
7 the 241-CX Tank System.

### 8 G1.1 Introductory and Continuing Training Program

9 The dangerous waste training program consists of introductory and continuing training designed to  
10 prepare personnel to manage and maintain the 241-CX Tank System in a safe, effective, and  
11 environmentally sound manner. In addition to preparing personnel to manage and maintain the 241-CX  
12 Tank System under normal conditions, the training program ensures that personnel are prepared to  
13 respond in a prompt and effective manner if abnormal or emergency conditions occur. Emergency  
14 response training is consistent with the description of actions contained in 241-CX Tank System  
15 Addendum J, “Contingency Plan.”

16 The introductory and continuing training programs include the following objectives:

- 17 • Train Hanford Facility personnel to perform their duties in a way that ensures compliance with  
18 [WAC 173-303](#).
- 19 • Train Hanford Facility personnel on dangerous waste management activities (including  
20 implementation of the contingency plan) relevant to the job titles/positions in which they  
21 are employed.
- 22 • Ensure that Hanford Facility personnel can respond effectively to emergencies.

23 The introductory and continuing training programs meet the requirements of [WAC 173-303-330](#),  
24 “Personnel Training,” through general Hanford Facility training, Contingency Plan training, Emergency  
25 Coordinator training, and Operations training, as outlined in this section.

#### 26 G1.1.1 Introductory Training

27 Introductory training includes general Hanford Facility training and project-specific training. General  
28 Hanford Facility training is described below. Project-specific training is provided to 241-CX Tank  
29 System personnel to allow those personnel to work unescorted and in some cases is required for escorted  
30 access. Personnel cannot perform a task for which they are not properly trained, except to gain required  
31 experience while under the direct supervision of a supervisor or coworker who is properly trained, as  
32 described in Section G2.1. Personnel must be trained within 6 months after their employment at or  
33 assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever  
34 is later.

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
<b>GENERAL TRAINING</b>											
000001	Hanford General Employee Training (CBT) ➤ <i>General safety, security, radiological protection, and emergency preparedness requirements.</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>FACILITY HEALTH &amp; SAFETY</b>											
290200 <sup>b</sup>	Project Orientation and FEHIC (CBT) ➤ <i>Hazard recognition, communication/information, waste management, and emergency response</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>BUILDING EMERGENCY</b>											
02028B	BED Initial Training (Classroom) ➤ <i>Prepare, respond, and recover from emergency events and responsibilities as outlined in DOE/RL-94-02</i>	Initial	ECT							X	
037515	BED Refresher Training (CBT) ➤ <i>Refresher for BED performance expectations and responsibilities as outlined in DOE/RL-94-02</i>	Annual	ECT							X	
304451	Project BED Qualification Card Checklist (OJT) ➤ <i>Emergency response actions and responsibilities of the BED specific to project facilities</i>	Initial	ECT							X	
<b>ECO TRAINING</b>											
600100	ECO Core (OJT) ➤ <i>Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices</i>	Initial	OT						X		

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position								
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers	
<b>WASTE OPERATIONS</b>												
02006G	Waste Management Awareness (Classroom) ➤ <i>Waste minimization, waste generation duties and responsibilities, notification, and recordkeeping</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>						X
020078	Advanced Mixed Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
035010	Waste Designation (Classroom) ➤ <i>Dangerous waste designation and land disposal restrictions according to WAC 173-303</i>	Initial	OT				X					
035012	Waste Designation Qualification (Classroom) ➤ <i>Waste designation and land disposal restrictions according to WAC 173-303</i>	Annual	OT				X					
035100	Container Management Initial (Classroom) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container management</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>	X	X				

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
035110	Container Waste Management Refresher (CBT) ➤ Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container management	Annual	OT	X			X	X			
153020	Waste Fundamentals Qualification Card (OJT) ➤ Waste designation, waste management, land disposal restrictions, and recordkeeping	Initial	OT				X				
153021	WMR Qualification Card (OJT) ➤ Work control activities, waste planning and packaging documentation, and transportation requirements	Initial	OT				X				
290004	Project NCO Waste Handler Qualification ➤ Waste handling, packaging, and storage	Every 2 years	OT					X			

a. Training types are provided in Attachment 5 of WA7890008967, Hanford Facility Resource Conservation and Recovery Act Permit.

b. Escorted personnel do not require training in course 290200.

c. Maintenance Craft and FWS supervising Maintenance Craft and D&D workers may take course 02006G or 035100. FWS supervising NCOs must take courses 035100 and 035110.

BED = Building Emergency Director

CBT = computer-based training

CPT = Contingency Plan training

D&D = decontamination and decommissioning

ECO = Environmental Compliance Officer

ECT = Emergency Coordinator training

FEHIC = Facility Emergency and Hazard Identification Checklist

FWS = Field Work Supervisor

GHFT = General Hanford Facility training

NCO = Nuclear Chemical Operator

OJT = on-the-job training

OT = Operations training

WMR = Waste Management Representative

- 1 • **General Hanford Facility training:** Hanford Facility personnel will receive general Hanford Facility  
2 training as described in Hanford Facility RCRA Permit Attachment 5, “Hanford Facility Personnel  
3 Training Program,” within 6 months of hire. This training provides orientation on dangerous waste  
4 management activities conducted at the Hanford Facility and includes the following:
- 5 – Description of emergency signals and appropriate personnel response
  - 6 – Identification of contacts for information regarding dangerous waste management activities
  - 7 – Introduction to waste minimization concepts
  - 8 – Identification of contact(s) for emergencies involving dangerous waste
  - 9 – Familiarization with the applicable portions of the Hanford Facility RCRA Permit  
10 Attachment 4, “Hanford Emergency Management Plan” (DOE/RL-94-02)
- 11 The Permittees will provide the necessary training to non-project personnel or visitors as appropriate  
12 for the locations and the activities undertaken. Non-project personnel or visitors include individuals  
13 not permanently assigned to a project facility and who do not have dangerous waste management  
14 responsibilities or supervise such activities. These individuals include, but are not limited to,  
15 administrative personnel, regulatory oversight, transient sampling personnel not permanently assigned  
16 to a project facility, and personnel used for temporary assignments. For Soil and Groundwater  
17 samplers, refer to Hanford Facility RCRA Permit Attachment 8, “Inspection and Training Plan for  
18 Groundwater Monitoring Wells.”
- 19 • **Contingency Plan training:** Project personnel receive training on applicable portions of  
20 DOE/RL-94-02 during general project training. To ensure effective emergency response, personnel  
21 also receive training on the content of the actions described in 241-CX Tank System Addendum J.
- 22 • **Emergency Coordinator training:** Project personnel facilitating emergency coordinator duties  
23 ([WAC 173-303-360](#), “Emergencies”), such as the Building Emergency Director (BED) within the  
24 Hanford Incident Command System, receive training on implementing the 241-CX Tank System  
25 Addendum J and Hanford Incident Command System BED responsibilities. These personnel must  
26 also become thoroughly familiar with applicable contingency plan documentation, operations,  
27 activities, location and properties of all waste handled, locations of all records, and the  
28 unit/building layout.
- 29 Emergency Coordinator training consists of the BED training courses required for facility BEDs,  
30 as described in Table G-1.
- 31 • **Operations training:** Dangerous waste management operations training (e.g., waste designation  
32 training and shippers training) will be determined on a unit-by-unit basis and shall consider the type  
33 of activities performed at the 241-CX Tank System (e.g., surveillance). Training provided for project  
34 operations is identified in Table G-1. Operations training consists of the following subjects:
- 35 – Container management
  - 36 – Waste handling
  - 37 – Container packaging and labeling
  - 38 – Position-specific training, as detailed in Table G-1

1 **G1.1.2 Continuing Training**

2 In accordance with the requirements of [WAC 173-303-330\(1\)\(b\)](#), dangerous waste workers participate in  
 3 an annual review of training, including general Hanford Facility training and unit/group-specific training.  
 4 The frequencies for individual training courses are described below:

- 5 • **General Hanford Facility training:** Annual refresher training is provided for general Hanford  
 6 Facility training. Refer to description in Section G1.1.1.
- 7 • **Contingency Plan training:** Annual refresher training is provided for contingency plan training.  
 8 Refer to description in Section G1.1.1.
- 9 • **Emergency Coordinator training:** Annual refresher training is provided for emergency coordinator  
 10 training, including the BED training course (Table G-1). Refer to description in Section G1.1.1.
- 11 • **Operations training:** Refresher training occurs at multiple frequencies (i.e., annual, every other year,  
 12 and every 3 years) for Operations training. When justified, some training will not contain a refresher  
 13 course and will be identified as a one-time-only training course. Table G-1 specifies the frequency for  
 14 each training course.

15 **G2 Description of Training Program**

16 The dangerous waste training program is overseen by a training manager who is knowledgeable in  
 17 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training  
 18 program by a combination of education and relevant experience. These qualifications are listed in  
 19 Table G-2, as required by [WAC 173-303-330\(2\)\(a\)](#).

Table G-2. 241-CX Tank System Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Field Work Supervisor	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Supervise activities.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Manage transfer and shipment of dangerous or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years of nuclear facility experience, or education/experience equivalent</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Waste Management Representative	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Choose containers for accumulation/storage, determine container markings, and determine waste segregation practices.</li> <li>• Complete waste designations.</li> <li>• Initiate process for waste shipments to TSDs for storage or disposal.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>

Table G-2. 241-CX Tank System Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Waste Shipper	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Prepare and certify waste shipment documentation for both onsite and offsite shipments of dangerous and/or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Maintenance Crafts	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> One year maintenance related</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Nuclear Chemical Operator	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate dangerous or mixed waste and place waste into pre-approved containers.</li> <li>• Apply container markings or labels.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Receive a transfer or shipment of dangerous or mixed waste.</li> <li>• Perform TSD unit inspections for areas subject to spills.</li> <li>• Perform inspections on dangerous or mixed waste containers and areas and notify operations management of problems encountered during inspections.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
D&D workers performing D4 on RCRA-authorized facilities	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Environmental Compliance Officer	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Ensure that operations are consistent with requirements contained in dangerous waste regulations (WAC 173-303).</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Experience with environmental regulations</p> <p><u>Education:</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience</p> <p><u>Other qualifications:</u> None</p>

Table G-2. 241-CX Tank System Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Building Emergency Director*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Provide direction during emergencies, evacuation, or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in the Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years nuclear facility experience</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> Field Work Supervisor qualified</p>
Training Manager	<ul style="list-style-type: none"> <li>• Ensure the application of a graded, systematic approach to training program development and administration.</li> <li>• Ensure that the training program will comply with WAC 173-303.</li> <li>• Approve training program content and provide final approval.</li> </ul>	<p><u>Requisite skills:</u> Four years nuclear facility experience</p> <p><u>Education:</u> Bachelor of Science or Bachelor of Arts degree</p> <p><u>Other qualifications:</u> None</p>

\*BEDs are assigned project personnel that have taken BED training.

BED = Building Emergency Director

D4 = deactivation, decommissioning, decontamination, and demolition

D&D = decontamination and decommissioning

RCRA = *Resource Conservation and Recovery Act of 1976*

TSD = treatment, storage, and/or disposal

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2 Training elements of [WAC 173-303-330\(1\)\(e\)](#) that are applicable to project operations include  
3 the following:

- 4 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 5 • Communications or alarm systems
- 6 • Response to fires or explosions

7 Proper design of the training program ensures that project personnel responsible for facilitating these  
8 elements are compliant with [WAC 173-303](#) requirements. Actual job tasks (referred to as duties) include  
9 the above-referenced elements and are used to determine training requirements. As such, project  
10 personnel receive training pertinent to the duties they perform. Table G-1 contains specific information  
11 regarding the training requirements for project personnel.

12 **G2.1 Qualification of Staff (Including On-the-Job Training)**

13 Training consists of a combination of self-study, classroom instruction, computer-based training, and  
14 on-the-job training (OJT) through use of a qualification card.

15 A qualification card is the formal mechanism used to document the specialized training and performance  
16 requirements of a specific job/task (e.g., waste management or waste shipping). Qualification cards list  
17 the specific courses, required reading, and OJT activities that must be completed in order for personnel to  
18 perform the job task independently. OJT activities involve qualified personnel demonstrating a specific  
19 task and then allowing the trainee to practice the task under supervision of the qualified OJT instructor.

1 The trainee’s knowledge and skills are then evaluated against established standards. This may include  
2 written and/or oral examinations, evaluations, and reviews to ensure that trainees are adequately trained  
3 commensurate with their job title(s)/position(s). Results of examinations, evaluations, and reviews are  
4 documented. Completed checklists, examinations, and evaluations are placed in each individual’s  
5 training record.

6 Qualification cards are generally required to be completed within 6 months to document that personnel  
7 who perform dangerous waste activities have been provided training within 6 months of assignment.  
8 Qualification/proficiency training may, of necessity and in accordance with the provisions of the  
9 collective bargaining agreements, take longer than 6 months to complete. In no case will unqualified  
10 personnel be allowed to complete specified tasks without direct oversight of certified personnel.

### 11 G2.1.1 Review of the Training Program

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

- 14 • All employees are required to complete Hanford General Employee Training (HGET) on an annual  
15 basis. This training is subject to biennial evaluation by HGET approval authorities who review and  
16 revise HGET lessons when deemed necessary.
- 17 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff  
18 feedback to incorporate changes to training curricula and/or frequency to address new or  
19 changing circumstances.
- 20 • Another element of the training program is to ensure that employees are assigned the correct training.  
21 Therefore, annual employee training plan reviews are conducted by assigned managers.
- 22 • At the student level, the effectiveness of the training program is determined by reviewing student  
23 feedback (e.g., evaluation forms) and evaluating student performance (e.g., test scores). Any changes  
24 deemed necessary to the training will be addressed by a revision and will be documented in the  
25 operating record.
- 26 • The training matrix (Table G-1) included in this addendum specifies regularly scheduled (required)  
27 refresher training frequencies for individual courses with the express purpose of ensuring  
28 a regimented review of course material at a topical level on a specified interval.

### 29 G3 Description of Training Plan

30 [WAC 173-303-330](#) requirements for training are satisfied by this addendum. A description of how  
31 documentation meets the three items in WAC 173-303-330(2) is as follows:

- 32 • WAC 173-303-330(2)(a): *The job title, job description, and name of the employee filling each job.*  
33 *The job description must include requisite skills, education, other qualifications, and duties for*  
34 *each position.*

35 **Description:** The specific personnel job title/position is correlated to the dangerous waste  
36 management duties. Dangerous waste management duties relating to [WAC 173-303](#) are correlated to  
37 training courses to verify that training is properly assigned.

38 Only names of project personnel who carry out duties relating to unit/group dangerous waste  
39 management activities are maintained. A list of personnel assigned to the project is available  
40 upon request.

41 Table G-2 summarizes the requisite skills, education, and other qualifications for job titles/positions.  
42 Detailed information regarding job titles, requisite skills, education, and other qualifications for  
43 personnel can be provided upon request.

- 1 • WAC 173-303-330(2)(b): *A written description of the type and amount of both introductory and*  
2 *continuing training required for each position.*

3 **Description:** In addition to the outline provided in Section G1.1, training courses developed to  
4 comply with the introductory and continuing training programs are identified and described in  
5 Table G-1. Certain job titles/positions identified in Table G-1 may have some variability of task  
6 assignment/responsibility. Personnel assigned specific dangerous waste management duties within  
7 a job title/position are only required to take the necessary training specific to those duties.

8 Note that equivalent training can be used to meet the dangerous waste training requirements outlined  
9 in Table G-1. Employees can substitute courses for the required training if the course is both similar  
10 in nature and quality, and allows employees to accomplish the duties of the position to which he or  
11 she is assigned. Personnel must provide documentation or certification that an employee’s training  
12 has resulted in training equivalent to the training required.

- 13 • WAC 173-303-330(2)(c): *Records documenting that personnel have received and completed the*  
14 *training required by this section. The Department may require, on a case-by-case basis, that training*  
15 *records include employee initials or signature to verify that training was received.*

16 **Description:** As specified in Hanford Facility RCRA Permit Condition II.C.5., the Permittee will  
17 maintain documentation in accordance with WAC 173-303-330(2) and (3) in the Hanford Facility  
18 Operating Record (241-CX Tank System portion).

19 Note that training records are maintained in accordance with the requirements of the *Privacy Act*  
20 *of 1974*. Personnel training records are available for inspection purposes in accordance with  
21 59 FR 17091, which gives federal, state, and local government officers “routine-use” access to  
22 training records when a regulatory program being implemented is applicable to a U.S. Department of  
23 Energy or contractor program.

# **B Plant Complex Closure Unit Group 24 (CUG-24), Addendum G, "Personnel Training"**

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy  
under Contract DE-AC06-08RL14788

**CH2MHILL**  
Plateau Remediation Company

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Richland, Washington 99352**

# B Plant Complex Closure Unit Group 24 (CUG-24), Addendum G, "Personnel Training"

Document Type: RPT      Program/Project: CPRM

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**APPROVED**

*By Lynn M. Ayers at 8:32 am, Sep 19, 2019*

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Release Approval

Date

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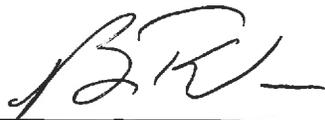
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**Certification**  
**for**  
**Supporting Permit Application Material for "Part V – Closure Units 'B Plant Complex**  
**Closure Unit Group 24 (CUG-24)," Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

---

Brian T. Vance, Manager  
Owner/Operator  
U.S. Department of Energy  
Richland Operations Office

  
\_\_\_\_\_  
Signature

9/28/19  
\_\_\_\_\_  
Date

**Certification  
for  
Supporting Permit Application Material for "Part V – Closure Units 'B Plant Complex  
Closure Unit Group 24 (CUG-24)'," Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

---

L. Ty Blackford, President and CEO  
Co-Operator  
CHPRC  
Richland, Washington



Signature

9/24/19  
Date

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## Addendum G

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## Personnel Training

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## Contents

<b>G1</b>	<b>Introduction.....</b>	<b>G-1</b>
	G1.1 Introductory and Continuing Training Program.....	G-1
	G1.1.1 Introductory Training .....	G-1
	G1.1.2 Continuing Training .....	G-6
<b>G2</b>	<b>Description of Training Program .....</b>	<b>G-6</b>
	G2.1 Qualification of Staff (Including On-the-Job Training) .....	G-8
	G2.1.1 Review of the Training Program.....	G-9
<b>G3</b>	<b>Description of Training Plan.....</b>	<b>G-9</b>

## Tables

Table G-1.	Personnel Training.....	G-2
Table G-2.	B Plant Complex Job Description.....	G-6

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1 **G1 Introduction**

2 This addendum discusses personnel training requirements based on [WAC 173-303](#), “Dangerous Waste  
3 Regulations”; and WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*  
4 (hereinafter referred to as the Hanford Facility RCRA Permit) for the B Plant Complex.

5 Permittees will comply with the training outlined in Table G-1, which provides the training requirements  
6 for Hanford Facility personnel associated with dangerous and/or mixed waste management activities at  
7 the B Plant Complex.

8 **G1.1 Introductory and Continuing Training Program**

9 The dangerous waste training program consists of introductory and continuing training designed to  
10 prepare personnel to manage and maintain the B Plant Complex in a safe, effective, and environmentally  
11 sound manner. In addition to preparing personnel to manage and maintain the B Plant Complex under  
12 normal conditions, the training program ensures that personnel are prepared to respond in a prompt  
13 and effective manner if abnormal or emergency conditions occur. Emergency response training  
14 is consistent with the description of actions contained in B Plant Complex Addendum J,  
15 “Contingency Plan.”

16 The introductory and continuing training programs include the following objectives:

- 17 • Train Hanford Facility personnel to perform their duties in a way that ensures compliance with  
18 [WAC 173-303](#).
- 19 • Train Hanford Facility personnel on dangerous waste management activities (including  
20 implementation of the contingency plan) relevant to the job titles/positions in which they  
21 are employed.
- 22 • Ensure that Hanford Facility personnel can respond effectively to emergencies.

23 The introductory and continuing training programs meet the requirements of [WAC 173-303-330](#),  
24 “Personnel Training,” through general Hanford Facility training, Contingency Plan training, Emergency  
25 Coordinator training, and Operations training, as outlined in this section.

26 **G1.1.1 Introductory Training**

27 Introductory training includes general Hanford Facility training and project-specific training. General  
28 Hanford Facility training is described below. Project-specific training is provided to B Plant Complex  
29 personnel to allow those personnel to work unescorted and in some cases is required for escorted access.  
30 Personnel cannot perform a task for which they are not properly trained, except to gain required  
31 experience while under the direct supervision of a supervisor or coworker who is properly trained, as  
32 described in Section G2.1. Personnel must be trained within 6 months after their employment at or  
33 assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever  
34 is later.

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
<b>GENERAL TRAINING</b>											
000001	Hanford General Employee Training (CBT) ➤ <i>General safety, security, radiological protection, and emergency preparedness requirements.</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>FACILITY HEALTH &amp; SAFETY</b>											
290200 <sup>b</sup>	Project Orientation and FEHIC (CBT) ➤ <i>Hazard recognition, communication/information, waste management, and emergency response</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>BUILDING EMERGENCY</b>											
02028B	BED Initial Training (Classroom) ➤ <i>Prepare, respond, and recover from emergency events and responsibilities as outlined in DOE/RL-94-02</i>	Initial	ECT							X	
037515	BED Refresher Training (CBT) ➤ <i>Refresher for BED performance expectations and responsibilities as outlined in DOE/RL-94-02</i>	Annual	ECT							X	
304451	Project BED Qualification Card Checklist (OJT) ➤ <i>Emergency response actions and responsibilities of the BED specific to project facilities</i>	Initial	ECT							X	
<b>ECO TRAINING</b>											
600100	ECO Core (OJT) ➤ <i>Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices</i>	Initial	OT						X		

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position								
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers	
<b>WASTE OPERATIONS</b>												
02006G	Waste Management Awareness (Classroom) ➤ <i>Waste minimization, waste generation duties and responsibilities, notification, and recordkeeping</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>						X
020078	Advanced Mixed Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
035010	Waste Designation (Classroom) ➤ <i>Dangerous waste designation and land disposal restrictions according to WAC 173-303</i>	Initial	OT				X					
035012	Waste Designation Qualification (Classroom) ➤ <i>Waste designation and land disposal restrictions according to WAC 173-303</i>	Annual	OT				X					
035100	Container Management Initial (Classroom) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>	X	X				

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position								
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers	
035110	Container Waste Management Refresher (CBT) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management</i>	Annual	OT	X		X	X	X				
153020	Waste Fundamentals Qualification Card (OJT) ➤ <i>Waste designation, waste management, land disposal restrictions, and recordkeeping</i>	Initial	OT				X					
153021	WMR Qualification Card (OJT) ➤ <i>Work control activities, waste planning and packaging documentation, and transportation requirements</i>	Initial	OT				X					
290004	Project NCO Waste Handler Qualification ➤ <i>Waste handling, packaging, and storage</i>	Every 2 years	OT					X				

a. Training types are provided in Attachment 5 of WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*.

b. Escorted personnel do not require training in course 290200.

c. Maintenance Craft and FWS supervising Maintenance Craft and D&D workers may take course 02006G or 035100. FWS supervising NCOs must take courses 035100 and 035110.

BED = Building Emergency Director

CBT = computer-based training

CPT = Contingency Plan training

D&D = decontamination and decommissioning

ECO = Environmental Compliance Officer

ECT = Emergency Coordinator training

FEHIC = Facility Emergency and Hazard Identification Checklist

FWS = Field Work Supervisor

GHFT = General Hanford Facility training

NCO = Nuclear Chemical Operator

OJT = on-the-job training

OT = Operations training

WMR = Waste Management Representative

- 1 • **General Hanford Facility training:** Hanford Facility personnel will receive general Hanford Facility  
2 training as described in Hanford Facility RCRA Permit Attachment 5, “Hanford Facility Personnel  
3 Training Program,” within 6 months of hire. This training provides orientation on dangerous waste  
4 management activities conducted at the Hanford Facility and includes the following:
- 5 – Description of emergency signals and appropriate personnel response
  - 6 – Identification of contacts for information regarding dangerous waste management activities
  - 7 – Introduction to waste minimization concepts
  - 8 – Identification of contact(s) for emergencies involving dangerous waste
  - 9 – Familiarization with the applicable portions of the Hanford Facility RCRA Permit  
10 Attachment 4, “Hanford Emergency Management Plan” (DOE/RL-94-02)
- 11 The Permittees will provide the necessary training to non-project personnel or visitors as appropriate  
12 for the locations and the activities undertaken. Non-project personnel or visitors include individuals  
13 not permanently assigned to a project facility and who do not have dangerous waste management  
14 responsibilities or supervise such activities. These individuals include, but are not limited to,  
15 administrative personnel, regulatory oversight, transient sampling personnel not permanently assigned  
16 to a project facility, and personnel used for temporary assignments. For Soil and Groundwater  
17 samplers, refer to Hanford Facility RCRA Permit Attachment 8, “Inspection and Training Plan for  
18 Groundwater Monitoring Wells.”
- 19 • **Contingency Plan training:** Project personnel receive training on applicable portions of  
20 DOE/RL-94-02 during general project training. To ensure effective emergency response, personnel  
21 also receive training on the content of the actions described in B Plant Complex Addendum J.
- 22 • **Emergency Coordinator training:** Project personnel facilitating emergency coordinator duties  
23 ([WAC 173-303-360](#), “Emergencies”), such as the Building Emergency Director (BED) within the  
24 Hanford Incident Command System, receive training on implementing the B Plant Complex  
25 Addendum J and Hanford Incident Command System BED responsibilities. These personnel must  
26 also become thoroughly familiar with applicable contingency plan documentation, operations,  
27 activities, location and properties of all waste handled, locations of all records, and the  
28 unit/building layout.
- 29 Emergency Coordinator training consists of the BED training courses required for facility BEDs,  
30 as described in Table G-1.
- 31 • **Operations training:** Dangerous waste management operations training (e.g., waste designation  
32 training and shippers training) will be determined on a unit-by-unit basis and shall consider the type  
33 of activities performed at the B Plant Complex (e.g., surveillance). Training provided for project  
34 operations is identified in Table G-1. Operations training consists of the following subjects:
- 35 – Container management
  - 36 – Waste handling
  - 37 – Container packaging and labeling
  - 38 – Position-specific training, as detailed in Table G-1

1 **G1.1.2 Continuing Training**

2 In accordance with the requirements of [WAC 173-303-330\(1\)\(b\)](#), dangerous waste workers participate in  
 3 an annual review of training, including general Hanford Facility training and unit/group-specific training.  
 4 The frequencies for individual training courses are described below:

- 5 • **General Hanford Facility training:** Annual refresher training is provided for general Hanford  
 6 Facility training. Refer to description in Section G1.1.1.
- 7 • **Contingency Plan training:** Annual refresher training is provided for contingency plan training.  
 8 Refer to description in Section G1.1.1.
- 9 • **Emergency Coordinator training:** Annual refresher training is provided for emergency coordinator  
 10 training, including the BED training course (Table G-1). Refer to description in Section G1.1.1.
- 11 • **Operations training:** Refresher training occurs at multiple frequencies (i.e., annual, every other year,  
 12 and every 3 years) for Operations training. When justified, some training will not contain a refresher  
 13 course and will be identified as a one-time-only training course. Table G-1 specify the frequency for  
 14 each training course.

15 **G2 Description of Training Program**

16 The dangerous waste training program is overseen by a training manager who is knowledgeable in  
 17 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training  
 18 program by a combination of education and relevant experience. These qualifications are listed in  
 19 Table G-2, as required by [WAC 173-303-330\(2\)\(a\)](#).

Table G-2. B Plant Complex Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Field Work Supervisor	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Supervise activities.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Manage transfer and shipment of dangerous or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years of nuclear facility experience, or education/experience equivalent</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Waste Management Representative	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Choose containers for accumulation/storage, determine container markings, and determine waste segregation practices.</li> <li>• Complete waste designations.</li> <li>• Initiate process for waste shipments to TSDs for storage or disposal.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>

Table G-2. B Plant Complex Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Waste Shipper	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Prepare and certify waste shipment documentation for both onsite and offsite shipments of dangerous and/or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Maintenance Crafts	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> One year maintenance related</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Nuclear Chemical Operator	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate dangerous or mixed waste and place waste into pre-approved containers.</li> <li>• Apply container markings or labels.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Receive a transfer or shipment of dangerous or mixed waste.</li> <li>• Perform TSD unit inspections for areas subject to spills.</li> <li>• Perform inspections on dangerous or mixed waste containers and areas and notify operations management of problems encountered during inspections.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
D&D workers performing D4 on RCRA-authorized facilities	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Environmental Compliance Officer	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Ensure that operations are consistent with requirements contained in dangerous waste regulations (WAC 173-303).</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Experience with environmental regulations</p> <p><u>Education:</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience</p> <p><u>Other qualifications:</u> None</p>

Table G-2. B Plant Complex Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Building Emergency Director*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Provide direction during emergencies, evacuation, or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in the Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years nuclear facility experience</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> Field Work Supervisor qualified</p>
Training Manager	<ul style="list-style-type: none"> <li>• Ensure the application of a graded, systematic approach to training program development and administration.</li> <li>• Ensure that the training program will comply with WAC 173-303.</li> <li>• Approve training program content and provide final approval.</li> </ul>	<p><u>Requisite skills:</u> Four years nuclear facility experience</p> <p><u>Education:</u> Bachelor of Science or Bachelor of Arts degree</p> <p><u>Other qualifications:</u> None</p>

\*BEDs are assigned project personnel that have taken BED training.

BED = Building Emergency Director

D4 = deactivation, decommissioning, decontamination, and demolition

D&D = decontamination and decommissioning

RCRA = *Resource Conservation and Recovery Act of 1976*

TSD = treatment, storage, and/or disposal

1

2 Training elements of [WAC 173-303-330\(1\)\(e\)](#) that are applicable to project operations include  
3 the following:

- 4 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 5 • Communications or alarm systems
- 6 • Response to fires or explosions

7 Proper design of the training program ensures that project personnel responsible for facilitating these  
8 elements are compliant with [WAC 173-303](#) requirements. Actual job tasks (referred to as duties) include  
9 the above-referenced elements and are used to determine training requirements. As such, project  
10 personnel receive training pertinent to the duties they perform. Table G-1 contains specific information  
11 regarding the training requirements for project personnel.

12 **G2.1 Qualification of Staff (Including On-the-Job Training)**

13 Training consists of a combination of self-study, classroom instruction, computer-based training, and  
14 on-the-job training (OJT) through use of a qualification card.

15 A qualification card is the formal mechanism used to document the specialized training and performance  
16 requirements of a specific job/task (e.g., waste management or waste shipping). Qualification cards list  
17 the specific courses, required reading, and OJT activities that must be completed in order for personnel to  
18 perform the job task independently. OJT activities involve qualified personnel demonstrating a specific  
19 task and then allowing the trainee to practice the task under supervision of the qualified OJT instructor.

1 The trainee’s knowledge and skills are then evaluated against established standards. This may include  
2 written and/or oral examinations, evaluations, and reviews to ensure that trainees are adequately trained  
3 commensurate with their job title(s)/position(s). Results of examinations, evaluations, and reviews are  
4 documented. Completed checklists, examinations, and evaluations are placed in each individual’s  
5 training record.

6 Qualification cards are generally required to be completed within 6 months to document that personnel  
7 who perform dangerous waste activities have been provided training within 6 months of assignment.  
8 Qualification/proficiency training may, of necessity and in accordance with the provisions of the  
9 collective bargaining agreements, take longer than 6 months to complete. In no case will unqualified  
10 personnel be allowed to complete specified tasks without direct oversight of certified personnel.

### 11 G2.1.1 Review of the Training Program

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

- 14 • All employees are required to complete Hanford General Employee Training (HGET) on an annual  
15 basis. This training is subject to biennial evaluation by HGET approval authorities who review and  
16 revise HGET lessons when deemed necessary.
- 17 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff  
18 feedback to incorporate changes to training curricula, and/or frequency to address new or changing  
19 circumstances.
- 20 • Another element of the training program is to ensure that employees are assigned the correct training.  
21 Therefore, annual employee training plan reviews are conducted by assigned managers.
- 22 • At the student level, the effectiveness of the training program is determined by reviewing student  
23 feedback (e.g., evaluation forms) and evaluating student performance (e.g., test scores). Any  
24 changes deemed necessary to the training will be addressed by a revision and will be documented in  
25 the operating record.
- 26 • The training matrix (Table G-1) included in this addendum specifies regularly scheduled (required)  
27 refresher training frequencies for individual courses with the express purpose of ensuring  
28 a regimented review of course material at a topical level on a specified interval.

### 29 G3 Description of Training Plan

30 [WAC 173-303-330](#) requirements for training are satisfied by this addendum. A description of how  
31 documentation meets the three items in WAC 173-303-330(2) is as follows:

- 32 • WAC 173-303-330(2)(a): *The job title, job description, and name of the employee filling each job.*  
33 *The job description must include requisite skills, education, other qualifications, and duties for each*  
34 *position.*

35 **Description:** The specific personnel job title/position is correlated to the dangerous waste  
36 management duties. Dangerous waste management duties relating to WAC 173-303 are correlated to  
37 training courses to verify that training is properly assigned.

38 Only names of project personnel who carry out duties relating to unit/group dangerous waste  
39 management activities are maintained. A list of personnel assigned to the project is available  
40 upon request.

41 Table G-2 summarizes the requisite skills, education, and other qualifications for job titles/positions.  
42 Detailed information regarding job titles, requisite skills, education, and other qualifications for  
43 personnel can be provided upon request.

- 1 • WAC 173-303-330(2)(b): *A written description of the type and amount of both introductory and*  
2 *continuing training required for each position.*

3 **Description:** In addition to the outline provided in Section G1.1, training courses developed to  
4 comply with the introductory and continuing training programs are identified and described in  
5 Table G-1. Certain job titles/positions identified in Table G-1 may have some variability of task  
6 assignment/responsibility. Personnel assigned specific dangerous waste management duties within  
7 a job title/position are only required to take the necessary training specific to those duties.

8 Note that equivalent training can be used to meet the dangerous waste training requirements outlined  
9 in Table G-1. Employees can substitute courses for the required training if the course is both similar  
10 in nature and quality, and allows employees to accomplish the duties of the position to which he or  
11 she is assigned. Personnel must provide documentation or certification that an employee’s training  
12 has resulted in training equivalent to the training required.

- 13 • WAC 173-303-330(2)(c): *Records documenting that personnel have received and completed the*  
14 *training required by this section. The Department may require, on a case-by-case basis, that training*  
15 *records include employee initials or signature to verify that training was received.*

16 **Description:** As specified in Hanford Facility RCRA Permit Condition II.C.5., the Permittee will  
17 maintain documentation in accordance with WAC 173-303-330(2) and (3) in the Hanford Facility  
18 Operating Record (B Plant Complex portion).

19 Note that training records are maintained in accordance with the requirements of the *Privacy Act*  
20 *of 1974*. Personnel training records are available for inspection purposes in accordance with  
21 59 FR 17091, which gives federal, state, and local government officers “routine-use” access to  
22 training records when a regulatory program being implemented is applicable to a U.S. Department of  
23 Energy or contractor program.

# Hexone Storage & Treatment Facility Closure Unit Group 19 (CUG-19), Addendum G, "Personnel Training"

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy  
under Contract DE-AC06-08RL14788

**CH2MHILL**  
Plateau Remediation Company

**P.O. Box 1600  
Richland, Washington 99352**

# Hexone Storage & Treatment Facility Closure Unit Group 19 (CUG-19), Addendum G, "Personnel Training"

Document Type: RPT      Program/Project: CPRM

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**APPROVED**

*By Lynn M. Ayers at 1:14 pm, Sep 19, 2019*

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Release Approval

Date

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**Certification  
for  
Supporting Permit Application Material for "Part V – Closure Units  
Hexone Storage & Treatment Facility Closure Unit Group 19 (CUG-19),"  
Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 9/28/19

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Brian T. Vance, Manager  
Owner/Operator  
U.S. Department of Energy  
Richland Operations Office

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Signature

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Date

**Certification  
for  
Supporting Permit Application Material for "Part V – Closure Units  
'Hexone Storage & Treatment Facility Closure Unit Group 19 (CUG-19)',"  
Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

\_\_\_\_\_  
L. Ty Blackford, President and CEO  
Co-Operator  
CHPRC  
Richland, Washington

\_\_\_\_\_  
Signature



\_\_\_\_\_  
Date

9/29/19

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## Addendum G

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## Personnel Training

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## Contents

<b>G1</b>	<b>Introduction.....</b>	<b>G-1</b>
	G1.1 Introductory and Continuing Training Program.....	G-1
	G1.1.1 Introductory Training .....	G-1
	G1.1.2 Continuing Training .....	G-5
<b>G2</b>	<b>Description of Training Program .....</b>	<b>G-6</b>
	G2.1 Qualification of Staff (Including On-the-Job Training) .....	G-8
	G2.1.1 Review of the Training Program.....	G-9
<b>G3</b>	<b>Description of Training Plan.....</b>	<b>G-9</b>

## Tables

Table G-1.	Personnel Training.....	G-2
Table G-2.	HSTF Job Description .....	G-6

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## 1 G1 Introduction

2 This addendum discusses personnel training requirements based on [WAC 173-303](#), “Dangerous Waste  
3 Regulations”; and WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*  
4 (hereinafter referred to as the Hanford Facility RCRA Permit) for the Hexone Storage and Treatment  
5 Facility (HSTF).

6 Permittees will comply with the training outlined in Table G-1, which provides the training requirements  
7 for Hanford Facility personnel associated with dangerous and/or mixed waste management activities at  
8 the HSTF.

### 9 G1.1 Introductory and Continuing Training Program

10 The dangerous waste training program consists of introductory and continuing training designed to  
11 prepare personnel to manage and maintain the HSTF in a safe, effective, and environmentally sound  
12 manner. In addition to preparing personnel to manage and maintain the HSTF under normal conditions,  
13 the training program ensures that personnel are prepared to respond in a prompt and effective manner if  
14 abnormal or emergency conditions occur. Emergency response training is consistent with the description  
15 of actions contained in the HSTF Addendum J, “Contingency Plan.”

16 The introductory and continuing training programs include the following objectives:

- 17 • Train Hanford Facility personnel to perform their duties in a way that ensures compliance with  
18 [WAC 173-303](#).
- 19 • Train Hanford Facility personnel dangerous on waste management activities (including  
20 implementation of the contingency plan) relevant to the job titles/positions in which they  
21 are employed.
- 22 • Ensure that Hanford Facility personnel can respond effectively to emergencies.

23 The introductory and continuing training programs meet the requirements of [WAC 173-303-330](#),  
24 “Personnel Training,” through general Hanford Facility training, Contingency Plan training, Emergency  
25 Coordinator training, and Operations training, as outlined in this section.

#### 26 G1.1.1 Introductory Training

27 Introductory training includes general Hanford Facility training and project-specific training. General  
28 Hanford Facility training is described below. Project-specific training is provided to HSTF personnel to  
29 allow those personnel to work unescorted and in some cases is required for escorted access. Personnel  
30 cannot perform a task for which they are not properly trained, except to gain required experience while  
31 under the direct supervision of a supervisor or coworker who is properly trained, as described in  
32 Section G2.1. Personnel must be trained within 6 months after their employment at or assignment to the  
33 Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later.

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
<b>GENERAL TRAINING</b>											
000001	Hanford General Employee Training (CBT) ➤ <i>General safety, security, radiological protection, and emergency preparedness requirements.</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>FACILITY HEALTH &amp; SAFETY</b>											
290200 <sup>b</sup>	Project Orientation and FEHIC (CBT) ➤ <i>Hazard recognition, communication/information, waste management, and emergency response</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>BUILDING EMERGENCY</b>											
02028B	BED Initial Training (Classroom) ➤ <i>Prepare, respond, and recover from emergency events and responsibilities as outlined in DOE/RL-94-02</i>	Initial	ECT							X	
037515	BED Refresher Training (CBT) ➤ <i>Refresher for BED performance expectations and responsibilities as outlined in DOE/RL-94-02</i>	Annual	ECT							X	
304451	Project BED Qualification Card Checklist (OJT) ➤ <i>Emergency response actions and responsibilities of the BED specific to project facilities</i>	Initial	ECT							X	
<b>ECO TRAINING</b>											
600100	ECO Core (OJT) ➤ <i>Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices</i>	Initial	OT						X		
<b>WASTE OPERATIONS</b>											

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position								
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers	
02006G	Waste Management Awareness (Classroom) ➤ <i>Waste minimization, waste generation duties and responsibilities, notification, and recordkeeping</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>						X
020078	Advanced Mixed Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X							
035010	Waste Designation (Classroom) ➤ <i>Dangerous waste designation and land disposal restrictions according to WAC 173-303</i>	Initial	OT				X					
035012	Waste Designation Qualification (Classroom) ➤ <i>Waste designation and land disposal restrictions according to WAC 173-303</i>	Annual	OT				X					
035100	Container Management Initial (Classroom) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container management</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>	X	X				

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
035110	Container Waste Management Refresher (CBT) ➤ Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container management	Annual	OT	X		X	X	X			
153020	Waste Fundamentals Qualification Card (OJT) ➤ Waste designation, waste management, land disposal restrictions, and recordkeeping	Initial	OT				X				
153021	WMR Qualification Card (OJT) ➤ Work control activities, waste planning and packaging documentation, and transportation requirements	Initial	OT				X				
290004	Project NCO Waste Handler Qualification ➤ Waste handling, packaging, and storage	Every 2 years	OT					X			

a. Training types are provided in Attachment 5 of WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*.

b. Escorted personnel do not require training in course 290200.

c. Maintenance Craft and FWS supervising Maintenance Craft and D&D workers may take course 02006G or 035100. FWS supervising NCOs must take courses 035100 and 035110.

BED = Building Emergency Director

CBT = computer-based training

CPT = Contingency Plan training

D&D = decontamination and decommissioning

ECO = Environmental Compliance Officer

ECT = Emergency Coordinator training

FEHIC = Facility Emergency and Hazard Identification Checklist

FWS = Field Work Supervisor

GHFT = General Hanford Facility training

NCO = Nuclear Chemical Operator

OJT = on-the-job training

OT = Operations training

WMR = Waste Management Representative

- 1 • **General Hanford Facility training:** Hanford Facility personnel will receive general Hanford Facility  
2 training as described in Hanford Facility RCRA Permit Attachment 5, “Hanford Facility Personnel  
3 Training Program,” within 6 months of hire. This training provides orientation on dangerous waste  
4 management activities conducted at the Hanford Facility and includes the following:
  - 5 – Description of emergency signals and appropriate personnel response
  - 6 – Identification of contacts for information regarding dangerous waste management activities
  - 7 – Introduction to waste minimization concepts
  - 8 – Identification of contact(s) for emergencies involving dangerous waste
  - 9 – Familiarization with the applicable portions of the Hanford Facility RCRA Permit  
10 Attachment 4, “Hanford Emergency Management Plan” (DOE/RL-94-02)

11 The Permittees will provide the necessary training to non-project personnel or visitors as appropriate  
12 for the locations and the activities undertaken. Non-project personnel or visitors include individuals  
13 not permanently assigned to a project facility and who do not have dangerous waste management  
14 responsibilities or supervise such activities. These individuals include, but are not limited to,  
15 administrative personnel, regulatory oversight, transient sampling personnel not permanently assigned  
16 to a project facility, and personnel used for temporary assignments. For Soil and Groundwater  
17 samplers, refer to Hanford Facility RCRA Permit Attachment 8, “Inspection and Training Plan for  
18 Groundwater Monitoring Wells.”

- 19 • **Contingency Plan training:** Project personnel receive training on applicable portions of  
20 DOE/RL-94-02 during general project training. To ensure effective emergency response, personnel  
21 also receive training on the content of the actions described in HSTF Addendum J.
- 22 • **Emergency Coordinator training:** Project personnel facilitating emergency coordinator duties  
23 ([WAC 173-303-360](#), “Emergencies”), such as the Building Emergency Director (BED) within the  
24 Hanford Incident Command System, receive training on implementing the HSTF Addendum J and  
25 Hanford Incident Command System BED responsibilities. These personnel must also become  
26 thoroughly familiar with applicable contingency plan documentation, operations, activities, locations  
27 and properties of all waste handled, location of all records, and the unit/building layout.

28 Emergency Coordinator training consists of the BED training courses required for facility BEDs,  
29 as described in Table G-1.

- 30 • **Operations training:** Dangerous waste management operations training (e.g., waste designation  
31 training and shippers training) will be determined on a unit-by-unit basis and shall consider the type  
32 of activities performed at the HSTF (e.g., surveillance). Training provided for project operations is  
33 identified in Table G-1. Operations training consists of the following subjects:
  - 34 – Container management
  - 35 – Waste handling
  - 36 – Container packaging and labeling
  - 37 – Position-specific training, as detailed in Table G-1

### 38 G1.1.2 Continuing Training

39 In accordance with the requirements of [WAC 173-303-330](#)(1)(b), dangerous waste workers participate in  
40 an annual review of training, including general Hanford Facility training and unit/group-specific training.  
41 The frequencies for individual training courses are described below:

- 1 • **General Hanford Facility training:** Annual refresher training is provided for general Hanford  
2 Facility training. Refer to description in Section G1.1.1.
- 3 • **Contingency Plan training:** Annual refresher training is provided for contingency plan training.  
4 Refer to description in Section G1.1.1.
- 5 • **Emergency Coordinator training:** Annual refresher training is provided for emergency coordinator  
6 training including the BED training course (Table G-1). Refer to description in Section G1.1.1.
- 7 • **Operations training:** Refresher training occurs at multiple frequencies (i.e., annual, every other year,  
8 and every 3 years) for Operations training. When justified, some training will not contain a refresher  
9 course and will be identified as a one-time-only training course. Table G-1 specifies the frequency for  
10 each training course.

## 11 G2 Description of Training Program

12 The dangerous waste training program is overseen by a training manager who is knowledgeable in  
13 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training  
14 program by a combination of education and relevant experience. These qualifications are listed in  
15 Table G-2, as required by [WAC 173-303-330\(2\)\(a\)](#).

Table G-2. HSTF Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Field Work Supervisor	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Supervise activities.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e))</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Manage transfer and shipment of dangerous or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years of nuclear facility experience, or education/experience equivalent</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Waste Management Representative	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Choose containers for accumulation/storage, determine container markings, and determine waste segregation practices.</li> <li>• Complete waste designations.</li> <li>• Initiate process for waste shipments to TSDs for storage or disposal.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Waste Shipper	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Prepare and certify waste shipment documentation for both onsite and offsite shipments of dangerous and/or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>

Table G-2. HSTF Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Maintenance Crafts	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> One year maintenance related</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Nuclear Chemical Operator	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate dangerous or mixed waste and place waste into pre-approved containers.</li> <li>• Apply container markings or labels.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Receive a transfer or shipment of dangerous or mixed waste.</li> <li>• Perform TSD unit inspections for areas subject to spills.</li> <li>• Perform inspections on dangerous or mixed waste containers and areas and notify operations management of problems encountered during inspections.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
D&D workers performing D4 on RCRA-authorized facilities	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Environmental Compliance Officer	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Ensure that operations are consistent with requirements contained in dangerous waste regulations (WAC 173-303).</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Experience with environmental regulations</p> <p><u>Education:</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience</p> <p><u>Other qualifications:</u> None</p>
Building Emergency Director*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Provide direction during emergencies, evacuation or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in the Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years nuclear facility experience</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> Field Work Supervisor qualified</p>

Table G-2. HSTF Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Training Manager	<ul style="list-style-type: none"> <li>• Ensure the application of a graded, systematic approach to training program development and administration.</li> <li>• Ensure that the training program will comply with WAC 173-303.</li> <li>• Approve training program content and provide final approval.</li> </ul>	<p><u>Requisite skills:</u> Four years nuclear facility experience</p> <p><u>Education:</u> Bachelor of Science or Bachelor of Arts degree</p> <p><u>Other qualifications:</u> None</p>

\*BEDs are assigned project personnel that have taken BED training.

BED = Building Emergency Director

D4 = deactivation, decommissioning, decontamination, and demolition

D&D = decontamination and decommissioning

RCRA = *Resource Conservation and Recovery Act of 1976*

TSD = treatment, storage, and/or disposal

1  
2 Training elements of [WAC 173-303-330](#)(1)(e) that are applicable to project operations include  
3 the following:

- 4 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 5 • Communications or alarm systems
- 6 • Response to fires or explosions

7 Proper design of the training program ensures that project personnel responsible for facilitating these  
8 elements are compliant with [WAC 173-303](#) requirements. Actual job tasks (referred to as duties) include  
9 the above-referenced elements and are used to determine training requirements. As such, project  
10 personnel receive training pertinent to the duties they perform. Table G-1 contains specific information  
11 regarding the training requirements for project personnel.

## 12 G2.1 Qualification of Staff (Including On-the-Job Training)

13 Training consists of a combination of self-study, classroom instruction, computer-based training, and  
14 on-the-job training (OJT) through use of a qualification card.

15 A qualification card is the formal mechanism used to document the specialized training and performance  
16 requirements of a specific job/task (e.g., waste management or waste shipping). Qualification cards list  
17 the specific courses, required reading, and OJT activities that must be completed in order for personnel to  
18 perform the job task independently. OJT activities involve qualified personnel demonstrating a specific  
19 task and then allowing the trainee to practice the task under supervision of the qualified OJT instructor.

20 The trainee’s knowledge and skills are then evaluated against established standards. This may include  
21 written and/or oral examinations, evaluations, and reviews to ensure that trainees are adequately trained  
22 commensurate with their job title(s)/position(s). Results of examinations, evaluations, and reviews are  
23 documented. Completed checklists, examinations, and evaluations are placed in each individual’s  
24 training record.

25 Qualification cards are generally required to be completed within 6 months to document that personnel  
26 who perform dangerous waste activities have been provided training within 6 months of assignment.  
27 Qualification/proficiency training may, of necessity and in accordance with the provisions of the  
28 collective bargaining agreements, take longer than 6 months to complete. In no case will unqualified  
29 personnel be allowed to complete specified tasks without direct oversight of certified personnel.

1 **G2.1.1 Review of the Training Program**

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

- 4 • All employees are required to complete Hanford General Employee Training (HGET) on an annual  
5 basis. This training is subject to biennial evaluation by HGET approval authorities who review and  
6 revise HGET lessons when deemed necessary.
- 7 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff  
8 feedback to incorporate changes to training curricula, and/or frequency to address new or  
9 changing circumstances.
- 10 • Another element of the training program is to ensure that employees are assigned the correct training.  
11 Therefore, annual employee training plan reviews are conducted by assigned managers.
- 12 • At the student level, the effectiveness of the training program is determined by reviewing student  
13 feedback (e.g., evaluation forms) and evaluating student performance (e.g., test scores). Any changes  
14 deemed necessary to the training, will be addressed by a revision and will be documented in the  
15 operating record.
- 16 • The training matrix (Table G-1) included in this addendum specifies regularly scheduled (required)  
17 refresher training frequencies for individual courses with the express purpose of ensuring a  
18 regimented review of course material at a topical level on a specified interval.

19 **G3 Description of Training Plan**

20 [WAC 173-303-330](#) requirements for training are satisfied by this addendum. A description of how  
21 documentation meets the three items in WAC 173-303-330(2) is as follows:

- 22 • WAC 173-303-330(2)(a): *The job title, job description, and name of the employee filling each job.*  
23 *The job description must include requisite skills, education, other qualifications, and duties for*  
24 *each position.*

25 **Description:** The specific personnel job title/position is correlated to the dangerous waste  
26 management duties. Dangerous waste management duties relating to WAC 173-303 are correlated to  
27 training courses to verify that training is properly assigned.

28 Only names of project personnel who carry out duties relating to unit/group dangerous waste  
29 management activities are maintained. A list of personnel assigned to the project is available  
30 upon request.

31 Table G-2 summarizes the requisite skills, education, and other qualifications for job titles/positions.  
32 Detailed information regarding job titles, requisite skills, education, and other qualifications for  
33 personnel can be provided upon request.

- 34 • WAC 173-303-330(2)(b): *A written description of the type and amount of both introductory and*  
35 *continuing training required for each position.*

36 **Description:** In addition to the outline provided in Section G1.1, training courses developed to  
37 comply with the introductory and continuing training programs are identified and described in  
38 Table G-1. Certain job titles/positions identified in Table G-1 may have some variability of task  
39 assignment/responsibility. Personnel assigned specific dangerous waste management duties within  
40 a job title/position are only required to take the necessary training specific to those duties.

1 Note that equivalent training can be used to meet the dangerous waste training requirements outlined  
2 in Table G-1. Employees can substitute courses for the required training if the course is both similar  
3 in nature and quality, and allows employees to accomplish the duties of the position to which he or  
4 she is assigned. Personnel must provide documentation or certification that an employee's training  
5 has resulted in training equivalent to the training required.

- 6 • WAC 173-303-330(2)(c): *Records documenting that personnel have received and completed the*  
7 *training required by this section. The Department may require, on a case-by-case basis, that training*  
8 *records include employee initials or signature to verify that training was received.*

9 **Description:** As specified in Hanford Facility RCRA Permit Condition II.C.5., the Permittee will  
10 maintain documentation in accordance with WAC 173-303-330(2) and (3) in the Hanford Facility  
11 Operating Record (HSTF portion).

12 Note that training records are maintained in accordance with the requirements of the *Privacy Act*  
13 *of 1974*. Personnel training records are available for inspection purposes in accordance with  
14 59 FR 17091, which gives federal, state, and local government officers "routine-use" access to  
15 training records when a regulatory program being implemented is applicable to a U.S. Department of  
16 Energy or contractor program.

# **PUREX Closure Unit Group 25 (CUG-25), Addendum G, "Personnel Training"**

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy  
under Contract DE-AC06-08RL14788

**CH2MHILL**  
Plateau Remediation Company

**P.O. Box 1600  
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# PUREX Closure Unit Group 25 (CUG-25), Addendum G, "Personnel Training"

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*By Janis D. Aardal at 11:10 am, Sep 19, 2019*

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Release Approval

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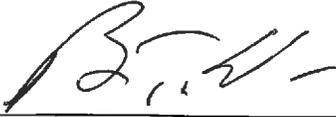
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for  
Supporting Permit Application Material for "Part V – Closure Units 'PUREX Closure  
Unit Group 25 (CUG-25)'," Addendum G, "Personnel Training"**

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

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Richland Operations Office

  
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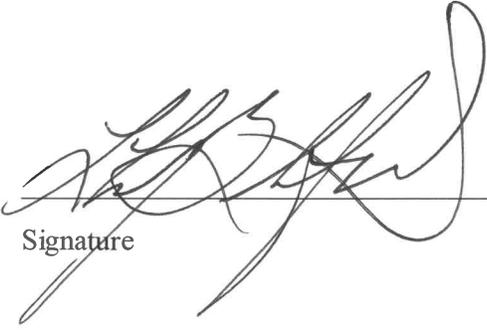
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Supporting Permit Application Material for "Part V – Closure Units 'PUREX Closure  
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---

L. Ty Blackford, President and CEO  
Co-Operator  
CHPRC  
Richland, Washington



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Signature

9/24/19  
Date

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## Addendum G

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## Personnel Training

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## Contents

<b>G1</b>	<b>Introduction.....</b>	<b>G-1</b>
	G1.1 Introductory and Continuing Training Program .....	G-1
	G1.1.1 Introductory Training .....	G-1
	G1.1.2 Continuing Training.....	G-6
<b>G2</b>	<b>Description of Training Program.....</b>	<b>G-6</b>
	G2.1 Qualification of Staff (Including On-the-Job Training) .....	G-8
	G2.1.1 Review of the Training Program.....	G-9
<b>G3</b>	<b>Description of Training Plan.....</b>	<b>G-9</b>

## Tables

Table G-1.	Personnel Training.....	G-2
Table G-2.	PUREX Job Description .....	G-6

1

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# 1 G1 Introduction

2 This addendum discusses personnel training requirements based on [WAC 173-303](#), “Dangerous Waste  
3 Regulations”; and WA7890008967, *Hanford Facility Resource Conservation and Recovery Act*  
4 *Permit* (hereinafter referred to as the Hanford Facility RCRA Permit) for the Plutonium-Uranium  
5 Extraction (PUREX) Plant.

6 Permittees will comply with the training outlined in Table G-1, which provides the training requirements  
7 for Hanford Facility personnel associated with dangerous and/or mixed waste management activities  
8 at PUREX.

## 9 G1.1 Introductory and Continuing Training Program

10 The dangerous waste training program consists of introductory and continuing training designed to  
11 prepare personnel to manage and maintain PUREX in a safe, effective, and environmentally sound  
12 manner. In addition to preparing personnel to manage and maintain PUREX under normal conditions, the  
13 training program ensures that personnel are prepared to respond in a prompt and effective manner if  
14 abnormal or emergency conditions occur. Emergency response training is consistent with the description  
15 of actions contained in PUREX Addendum J, “Contingency Plan.”

16 The introductory and continuing training programs include the following objectives:

- 17 • Train Hanford Facility personnel to perform their duties in a way that ensures compliance with  
18 [WAC 173-303](#).
- 19 • Train Hanford Facility on personnel dangerous waste management activities (including  
20 implementation of the contingency plan) relevant to the job titles/positions in which they  
21 are employed.
- 22 • Ensure that Hanford Facility personnel can respond effectively to emergencies.

23 The introductory and continuing training programs meet the requirements of [WAC 173-303-330](#),  
24 “Personnel Training,” through general Hanford Facility training, Contingency Plan training, Emergency  
25 Coordinator training, and Operations training, as outlined in this section.

### 26 G1.1.1 Introductory Training

27 Introductory training includes general Hanford Facility training and project-specific training. General  
28 Hanford Facility training is described below. Project-specific training is provided to PUREX personnel to  
29 allow those personnel to work unescorted and in some cases is required for escorted access. Personnel  
30 cannot perform a task for which they are not properly trained, except to gain required experience while  
31 under the direct supervision of a supervisor or coworker who is properly trained, as described in  
32 Section G2.1. Personnel must be trained within 6 months after their employment at or assignment to the  
33 Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later.

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
<b>GENERAL TRAINING</b>											
000001	Hanford General Employee Training (CBT) ➤ <i>General safety, security, radiological protection, and emergency preparedness requirements.</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>FACILITY HEALTH &amp; SAFETY</b>											
290200 <sup>b</sup>	Project Orientation and FEHIC (CBT) ➤ <i>Hazard recognition, communication/information, waste management, and emergency response</i>	Annual	GHFT, CPT	X	X	X	X	X	X	X	X
<b>BUILDING EMERGENCY</b>											
02028B	BED Initial Training (Classroom) ➤ <i>Prepare, respond, and recover from emergency events and responsibilities as outlined in DOE/RL-94-02</i>	Initial	ECT							X	
037515	BED Refresher Training (CBT) ➤ <i>Refresher for BED performance expectations and responsibilities as outlined in DOE/RL-94-02</i>	Annual	ECT							X	
304451	Project BED Qualification Card Checklist (OJT) ➤ <i>Emergency response actions and responsibilities of the BED specific to project facilities</i>	Initial	ECT							X	
<b>ECO TRAINING</b>											
600100	ECO Core (OJT) ➤ <i>Knowledge of environmental regulations, permits, regulator inspections and notifications, recordkeeping, and pollution prevention practices</i>	Initial	OT						X		

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
<b>WASTE OPERATIONS</b>											
02006G	Waste Management Awareness (Classroom) ➤ <i>Waste minimization, waste generation duties and responsibilities, notification, and recordkeeping</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>					X
020078	Advanced Mixed Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X						
020159	Advanced Hazardous Waste Shipper Certification Training (Classroom) ➤ <i>Shipping techniques on hazardous waste labels, containers, packing, and manifesting</i>	Every 3 years	OT		X						
035010	Waste Designation (Classroom) ➤ <i>Dangerous waste designation and land disposal restrictions according to WAC 173-303</i>	Initial	OT				X				
035012	Waste Designation Qualification (Classroom) ➤ <i>Waste designation and land disposal restrictions according to WAC 173-303</i>	Annual	OT				X				
035100	Container Management Initial (Classroom) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management</i>	Initial	OT	X <sup>c</sup>		X <sup>c</sup>	X	X			

Table G-1. Personnel Training

Course Number	Course Title/Description	Frequency	Training Type <sup>a</sup>	Job Title/Position							
				Maintenance Craft	Waste Shipper	FWS	WMR	NCO	ECO	BED	D&D Workers
035110	Container Waste Management Refresher (CBT) ➤ <i>Waste minimization and pollution prevention, waste designation categories, recordkeeping, and container inspection and management</i>	Annual	OT	X		X	X	X			
153020	Waste Fundamentals Qualification Card (OJT) ➤ <i>Waste designation, waste management, land disposal restrictions, and recordkeeping</i>	Initial	OT				X				
153021	WMR Qualification Card (OJT) ➤ <i>Work control activities, waste planning and packaging documentation, and transportation requirements</i>	Initial	OT				X				
290004	Project NCO Waste Handler Qualification ➤ <i>Waste handling, packaging, and storage</i>	Every 2 years	OT					X			

a. Training types are provided in Attachment 5 of WA7890008967, *Hanford Facility Resource Conservation and Recovery Act Permit*.

b. Escorted personnel do not require training in course 290200.

c. Maintenance Craft and FWS supervising Maintenance Craft and D&D workers may take course 02006G or 035100. FWS supervising NCOs must take courses 035100 and 035110.

BED = Building Emergency Director

CBT = computer-based training

CPT = Contingency Plan training

D&D = decontamination and decommissioning

ECO = Environmental Compliance Officer

ECT = Emergency Coordinator training

FEHIC = Facility Emergency and Hazard Identification Checklist

FWS = Field Work Supervisor

GHFT = General Hanford Facility training

NCO = Nuclear Chemical Operator

OJT = on-the-job training

OT = Operations training

WMR = Waste Management Representative

- 1 • **General Hanford Facility training:** Hanford Facility personnel will receive general Hanford Facility  
2 training as described in Hanford Facility RCRA Permit Attachment 5, “Hanford Facility Personnel  
3 Training Program,” within 6 months of hire. This training provides orientation on dangerous waste  
4 management activities conducted at the Hanford Facility and includes the following:
- 5 – Description of emergency signals and appropriate personnel response
  - 6 – Identification of contacts for information regarding dangerous waste management activities
  - 7 – Introduction to waste minimization concepts
  - 8 – Identification of contact(s) for emergencies involving dangerous waste
  - 9 – Familiarization with the applicable portions of the Hanford Facility RCRA Permit  
10 Attachment 4, “Hanford Emergency Management Plan” (DOE/RL-94-02)
- 11 The Permittees will provide the necessary training to non-project personnel or visitors as appropriate  
12 for the locations and the activities undertaken. Non-project personnel or visitors include individuals  
13 not permanently assigned to a project facility and who do not have dangerous waste management  
14 responsibilities or supervise such activities. These individuals include, but are not limited to,  
15 administrative personnel, regulatory oversight, transient sampling personnel not permanently assigned  
16 to a project facility, and personnel used for temporary assignments. For Soil and Groundwater  
17 samplers, refer to Hanford Facility RCRA Permit Attachment 8, “Inspection and Training Plan for  
18 Groundwater Monitoring Wells.”
- 19 • **Contingency Plan training:** Project personnel receive training on applicable portions of  
20 DOE/RL-94-02 during general project training. To ensure effective emergency response, personnel  
21 also receive training on the content of the actions described in PUREX Addendum J.
- 22 • **Emergency Coordinator training:** Project personnel facilitating emergency coordinator duties  
23 ([WAC 173-303-360](#), “Emergencies”), such as the Building Emergency Director (BED) within the  
24 Hanford Incident Command System, receive training on implementing the PUREX Addendum J and  
25 Hanford Incident Command System BED responsibilities. These personnel must also become  
26 thoroughly familiar with applicable contingency plan documentation, operations, activities, location  
27 and properties of all waste handled, locations of all records, and the unit/building layout.
- 28 Emergency Coordinator training consists of the BED training courses required for facility BEDs,  
29 as described in Table G-1.
- 30 • **Operations training:** Dangerous waste management operations training (e.g., waste designation  
31 training and shippers training) will be determined on a unit-by-unit basis and shall consider the type  
32 of activities performed at PUREX (e.g., surveillance). Training provided for project operations is  
33 identified in Table G-1. Operations training consists of the following subjects:
- 34 – Container management
  - 35 – Waste handling
  - 36 – Container packaging and labeling
  - 37 – Position-specific training, as detailed in Table G-1

1 G1.1.2 Continuing Training

2 In accordance with the requirements of [WAC 173-303-330](#)(1)(b), dangerous waste workers participate in  
 3 an annual review of training, including general Hanford Facility training and unit/group-specific training.  
 4 The frequencies for individual training courses are described below:

- 5 • **General Hanford Facility training:** Annual refresher training is provided for general Hanford  
 6 Facility training. Refer to description in Section G1.1.1.
- 7 • **Contingency Plan training:** Annual refresher training is provided for contingency plan training.  
 8 Refer to description in Section G1.1.1.
- 9 • **Emergency Coordinator training:** Annual refresher training is provided for emergency coordinator  
 10 training including the BED training course (Table G-1). Refer to description in Section G1.1.1.
- 11 • **Operations training:** Refresher training occurs on multiple frequencies (i.e., annual, every other  
 12 year, and every 3 years) for Operations training. When justified, some training will not contain  
 13 a refresher course and will be identified as a one-time-only training course. Table G-1 specifies the  
 14 frequency for each training course.

15 G2 Description of Training Program

16 The dangerous waste training program is overseen by a training manager who is knowledgeable in  
 17 dangerous waste management procedures and is otherwise qualified to design a dangerous waste training  
 18 program by a combination of education and relevant experience. These qualifications are listed in  
 19 Table G-2, as required by [WAC 173-303-330](#)(2)(a).

Table G-2. PUREX Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Field Work Supervisor	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Supervise activities.</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Manage transfer and shipment of dangerous or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years of nuclear facility experience, or education/experience equivalent</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Waste Management Representative	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Choose containers for accumulation/storage, determine container markings, and determine waste segregation practices.</li> <li>• Complete waste designations.</li> <li>• Initiate process for waste shipments to TSDs for storage or disposal.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>

Table G-2. PUREX Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Waste Shipper	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Prepare and certify waste shipment documentation for both onsite and offsite shipments of dangerous and/or mixed waste.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Maintenance Crafts	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> One year maintenance related</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
Nuclear Chemical Operator	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Respond to fires or explosions (element of WAC 173-303-330(1)(e)).</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate dangerous or mixed waste and place waste into pre-approved containers.</li> <li>• Apply container markings or labels</li> <li>• Use emergency and monitoring equipment (element of WAC 173-303-330(1)(e)).</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Receive a transfer or shipment of dangerous or mixed waste.</li> <li>• Perform TSD unit inspections for areas subject to spills.</li> <li>• Perform inspections on dangerous or mixed waste containers and areas and notify operations management of problems encountered during inspections.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> None</p>
D&D workers performing D4 on RCRA-authorized facilities	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Generate and handle dangerous or mixed waste during work activities.</li> </ul>	<p><u>Requisite skills:</u> None</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> As detailed in Table G-1</p>
Environmental Compliance Officer	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Ensure that operations are consistent with requirements contained in dangerous waste regulations (WAC 173-303).</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Experience with environmental regulations</p> <p><u>Education:</u> Bachelor of Arts or Bachelor of Science degree in a technical discipline or an equivalent combination of education and experience</p> <p><u>Other qualifications:</u> None</p>

Table G-2. PUREX Job Description

Job Title/Position	Job Description	
	Duties	Requisite Skills, Education, Other Qualifications
Building Emergency Director*	<ul style="list-style-type: none"> <li>• Report discovered spills and releases.</li> <li>• Evacuate or take cover in response to specific incidents.</li> <li>• Respond to and use communications or alarm systems (element of WAC 173-303-330(1)(e)).</li> <li>• Provide direction during emergencies, evacuation, or take cover.</li> <li>• Perform RCRA Emergency Coordinator duties as the BED in the Hanford Incident Command System.</li> <li>• Prepare and submit environmental records.</li> </ul>	<p><u>Requisite skills:</u> Three years nuclear facility experience</p> <p><u>Education:</u> High school diploma or equivalent</p> <p><u>Other qualifications:</u> Field Work Supervisor qualified</p>
Training Manager	<ul style="list-style-type: none"> <li>• Ensure the application of a graded, systematic approach to training program development and administration.</li> <li>• Ensure that the training program will comply with WAC 173-303.</li> <li>• Approve training program content and provide final approval.</li> </ul>	<p><u>Requisite skills:</u> Four years nuclear facility experience</p> <p><u>Education:</u> Bachelor of Science or Bachelor of Arts degree</p> <p><u>Other qualifications:</u> None</p>

\*BEDs are assigned project personnel that have taken BED training.

BED = Building Emergency Director

D4 = deactivation, decommissioning, decontamination, and demolition

D&D = decontamination and decommissioning

RCRA = *Resource Conservation and Recovery Act of 1976*

TSD = treatment, storage, and/or disposal

1

2 Training elements of [WAC 173-303-330\(1\)\(e\)](#) that are applicable to project operations include  
3 the following:

- 4 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 5 • Communications or alarm systems
- 6 • Response to fires or explosions

7 Proper design of the training program ensures that project personnel responsible for facilitating these  
8 elements are compliant with [WAC 173-303](#) requirements. Actual job tasks (referred to as duties) include  
9 the above-referenced elements and are used to determine training requirements. As such, project  
10 personnel receive training pertinent to the duties they perform. Table G-1 contains specific information  
11 regarding the training requirements for project personnel.

12 **G2.1 Qualification of Staff (Including On-the-Job Training)**

13 Training consists of a combination of self-study, classroom instruction, computer-based training, and  
14 on-the-job training (OJT) through use of a qualification card.

15 A qualification card is the formal mechanism used to document the specialized training and performance  
16 requirements of a specific job/task (e.g., waste management or waste shipping). Qualification cards list  
17 the specific courses, required reading, and OJT activities that must be completed in order for personnel to  
18 perform the job task independently. OJT activities involve qualified personnel demonstrating a specific  
19 task and then allowing the trainee to practice the task under supervision of the qualified OJT instructor.

1 The trainee’s knowledge and skills are then evaluated against established standards. This may include  
2 written and/or oral examinations, evaluations, and reviews to ensure that trainees are adequately trained  
3 commensurate with their job title(s)/position(s). Results of examinations, evaluations, and reviews are  
4 documented. Completed checklists, examinations, and evaluations are placed in each individual’s  
5 training record.

6 Qualification cards are generally required to be completed within 6 months to document that personnel  
7 who perform dangerous waste activities have been provided training within 6 months of assignment.  
8 Qualification/proficiency training may, of necessity and in accordance with the provisions of the  
9 collective bargaining agreements, take longer than 6 months to complete. In no case will unqualified  
10 personnel be allowed to complete specified tasks without direct oversight of certified personnel.

### 11 G2.1.1 Review of the Training Program

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

- 14 • All employees are required to complete Hanford General Employee Training (HGET) on an annual  
15 basis. This training is subject to biennial evaluation by HGET approval authorities who review, and  
16 revise HGET lessons when deemed necessary.
- 17 • The Permittee accounts for rule changes, facility changes, observed difficulties, and staff  
18 feedback to incorporate changes to training curricula, and/or frequency to address new or  
19 changing circumstances.
- 20 • Another element of the training program is to ensure that employees are assigned the correct training.  
21 Therefore, annual employee training plan reviews are conducted by assigned managers.
- 22 • At the student level, the effectiveness of the training program is determined by reviewing student  
23 feedback (e.g., evaluation forms) and evaluating student performance (e.g., test scores). Any changes  
24 deemed necessary to the training will be addressed by a revision and will be documented in the  
25 operating record.
- 26 • The training matrix (Table G-1) included in this addendum specifies regularly scheduled (required)  
27 refresher training frequencies for individual courses with the express purpose of ensuring  
28 a regimented review of course material at a topical level on a specified interval.

## 29 G3 Description of Training Plan

30 [WAC 173-303-330](#) requirements for training are satisfied by this addendum. A description of how  
31 documentation meets the three items in WAC 173-303-330(2) is as follows:

- 32 • WAC 173-303-330(2)(a): *The job title, job description, and name of the employee filling each job.*  
33 *The job description must include requisite skills, education, other qualifications, and duties for*  
34 *each position.*

35 **Description:** The specific personnel job title/position is correlated to the dangerous waste  
36 management duties. Dangerous waste management duties relating to [WAC 173-303](#) are correlated to  
37 training courses to verify that training is properly assigned.

38 Only names of project personnel who carry out duties relating to unit/group dangerous waste  
39 management activities are maintained. A list of personnel assigned to the project is available  
40 upon request.

41 Table G-2 summarizes the requisite skills, education, and other qualifications for job titles/positions.  
42 Detailed information regarding job titles, requisite skills, education, and other qualifications for  
43 personnel can be provided upon request.

- 1 • WAC 173-303-330(2)(b): *A written description of the type and amount of both introductory and*  
2 *continuing training required for each position.*

3 **Description:** In addition to the outline provided in Section G1.1, training courses developed to  
4 comply with the introductory and continuing training programs are identified and described in  
5 Table G-1. Certain job titles/positions identified in Table G-1 may have some variability of task  
6 assignment/responsibility. Personnel assigned specific dangerous waste management duties within  
7 a job title/position are only required to take the necessary training specific to those duties.

8 Note that equivalent training can be used to meet the dangerous waste training requirements outlined  
9 in Table G-1. Employees can substitute courses for the required training if the course is both similar  
10 in nature and quality, and allows employees to accomplish the duties of the position to which he or  
11 she is assigned. Personnel must provide documentation or certification that an employee's training  
12 has resulted in training equivalent to the training required.

- 13 • WAC 173-303-330(2)(c): *Records documenting that personnel have received and completed the*  
14 *training required by this section. The Department may require, on a case-by-case basis, that training*  
15 *records include employee initials or signature to verify that training was received.*

16 **Description:** As specified in Hanford Facility RCRA Permit Condition II.C.5., the Permittee will  
17 maintain documentation in accordance with WAC 173-303-330(2) and (3) in the Hanford Facility  
18 Operating Record (PUREX portion).

19 Note that training records are maintained in accordance with the requirements of the *Privacy Act*  
20 *of 1974*. Personnel training records are available for inspection purposes in accordance with  
21 59 FR 17091, which gives federal, state, and local government officers "routine-use" access to  
22 training records when a regulatory program being implemented is applicable to a U.S. Department of  
23 Energy or contractor program.