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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 1, 1999

Mr. Anthony Miskho
Fluor Daniel Hanford, Inc.
P.O. Box 1000, MSIN: G1-37
Richland, Washington 99352



Re: Proposed Changes to Unit-Specific Final Status Permits,
Chapter 8, Personnel Training

Dear Tony,

The Ecology staff has reviewed your proposal for changes to Chapter 8, Personnel Training, for permitted Treatment, Storage, and Disposal (TSD) units at Hanford (Enclosure). In response, Ecology offers the following direction and/or clarification:

Written personnel training plan documentation must be included within and maintained as an enforceable part of the Part B Permit Application and the Hanford Facility RCRA Permit. As such, changes made to the written personnel training plan are subject to the Permit Modification process.

The Hanford Sitewide permit is constructed such that much of the dangerous waste management criteria that apply Sitewide are included as Conditions in Part I, Standard Conditions, and Part II, General Facility Conditions. Unit-specific Conditions are then detailed in Parts III, IV, V, and VI for Operating Units, Corrective Action (pending), Closure, and Post-Closure, respectively. Conditions II.C. in the Hanford Facility RCRA Permit call for the Permittee to conduct personnel training as required by WAC 173-303-330, and describe the training plan in the unit-specific chapters. In other words, the Permittee is required to *fulfill the information requirements* of a written personnel training plan as part of the unit-specific chapters, not reference another document where the written personnel training plan could be found. It is Ecology's practice throughout Washington State to require inclusion of the written personnel training plan documentation as an enforceable part of a Dangerous Waste Permit.

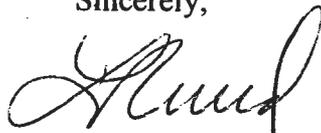
Your proposal to maintain the personnel training plan outside the Hanford Facility RCRA Permit, coupled with the proposal that changes to the personnel training plan are not subject to the Permit Modification process, is unacceptable.

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Brenda Becker-Khaleel, Ecology's Permit Writer for the 222-S Laboratory, is reviewing the draft personnel training plan submitted for the 222-S Laboratory. As you know, your proposed personnel training plan was used as a model for drafting the 222-S personnel training plan. Ms. Becker-Khaleel is preparing a detailed Notice of Deficiency (NOD) in response to the draft 222-S personnel training plan. The NOD will help to clarify the detailed information required for an acceptable unit-specific training plan. As we have discussed, Ecology understands the need for flexibility in certain areas such as maintaining the current list of names of the employees filling each job (WAC 173-303-330(2)(a)). Arrangements for these considerations can be made with the unit-specific Permit Writer.

If you have any questions, please contact me at (509) 736-5715.

Sincerely,



Laura Ruud
Permitting Specialist
Nuclear Waste Program

LR:ld

cc: Tony McKarns, USDOE
Cliff Clark, USDOE
Harold Tilden, PNNL
Gary Robinson, BHI
Suzette Thompson, FDH
Sue Price, FDH
Fred Ruck, FDH
Administrative Record: Hanford Sitewide Permit

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8.0 PERSONNEL TRAINING [H]

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

Compliance with these requirements at the [insert TSD unit name] is demonstrated by information contained both in the Hanford Facility Dangerous Waste Permit Application, General Information Portion (Chapter 8.0 of DOE/RL-91-28: Attachment 33 of the HF RCRA Permit and this chapter. This chapter supplements Chapter 8.0 of DOE/RL-91-28.

8.1 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

The introductory and continuing training programs are designed to prepare personnel to manage and maintain the TSD unit in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain TSD units under normal conditions, the training programs ensure that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is consistent with the description of actions contained in Chapter 7.0, Contingency Plan.

Introductory training includes general Hanford Facility training and TSD unit-specific training. General Hanford Facility training is described in DOE/RL-91-28, Section 8.1, and is provided in accordance with the HF RCRA Permit (DW Portion), Condition II.C.2. TSD unit-specific training is provided to Hanford Facility personnel allowing personnel to work unescorted. Hanford Facility personnel cannot perform a task for which they are not properly trained, except to gain required experience while under the direct supervision of a supervisor or coworker who is properly trained. Hanford Facility personnel assigned the job title of Emergency Coordinator and alternates to this position performing tasks described in WAC 173-303-360 (e.g., Building Emergency Directors) are thoroughly familiar with applicable contingency plan documentation, operations, activities, location, and properties of all waste handled, location of all records, and the unit/building layout.

Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general Hanford Facility training and TSD unit-specific training. General Hanford Facility training is the same as described for introductory training. TSD unit-specific training provides an annual review of emergency response training and an annual review of training necessary to ensure TSD unit operations are in compliance with WAC 173-303.

8.2 DESCRIPTION OF TRAINING DESIGN

Proper design of a training program ensures personnel who perform duties on the Hanford Facility related to WAC 173-303-330(1)(d) are trained to perform their duties in compliance with WAC 173-303. Actual job tasks, referred to as duties and responsibilities, are used to determine training requirements.

1 Elements of WAC 173-303-330(1)(d) applicable to the [insert TSD unit name] operations include the
2 following:
3 [Select applicable items for TSD unit].
4

- 5 • Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- 6 • Key parameters for automatic waste feed cut-off systems
- 7 • Communications or alarm systems
- 8 • Response to fires or explosions
- 9 • Response to groundwater contamination incidents
- 10 • Shutdown of operations.

11
12 Hanford Facility personnel who perform these duties and have these responsibilities receive training
13 pertaining to their duties and responsibilities. The written training plan documentation described in
14 Section 8.3, prepared for [insert TSD unit name] operations as required by WAC 173-303-330(2),
15 contains specific information regarding the types of training Hanford Facility personnel receive.
16
17

18 8.3 DESCRIPTION OF TRAINING PLAN

19 In accordance with HF RCRA Permit (DW Portion), Condition II.C.3, the unit-specific portion of the
20 *Hanford Facility Dangerous Waste Permit Application* must contain a description of the training plan.
21 Written training plan documentation is maintained outside of the *Hanford Facility Dangerous Waste Part*
22 *B Permit Application* and the HF RCRA Permit. Therefore, changes made to the written training plan
23 documentation are not subject to the HF RCRA Permit modification process.
24

25 Written training plan documentation is prepared to comply with WAC 173-303-330(2). Documentation
26 prepared to meet the written training plan could consist of hard copy or electronic media as provided by
27 HF RCRA Permit (DW Portion), Condition II.I.1. The written training plan documentation could consist
28 of more than one document or a training database as long as the components are identified in a core
29 document.
30

31 A description of how Dangerous Waste Training Plan (DWTP) documentation meets the three items in
32 WAC 173-303-330(2) is as follows:
33

- 34 1. -330(2)(a): "The job title, job description, and name of the employee filling each job. The job
35 description must include requisite skills, education, other qualifications, and duties for each position."
36

37 Description: The specific personnel job titles and duties for each position are maintained in the core
38 DWTP document. Duties (responsibilities) for positions relating to WAC 173-303 are described in
39 the DWTP core document and are listed under the specific job title to ensure training for personnel
40 are determined properly.
41

42 Names of Hanford Facility personnel who carry out activities relating to [insert TSD unit name] are
43 maintained. Names could be maintained within the DWTP core document or by other means
44 referenced in the DWTP core document. A list of Hanford Facility personnel assigned to the [insert
45 TSD unit name] is available upon request.
46

47 Prerequisite skills, education, and other qualification requirements are addressed by making general
48 statements in the DWTP and referencing where this information is maintained (e.g., human
49 resources). Specific information concerning job title, requisite skills, education, and other

1 qualifications for personnel might not be included in the DWTP core document if this information can
2 be provided upon request.

3
4 Names of Hanford Facility personnel and non-facility personnel performing duties and
5 responsibilities not related to [insert TSD unit name] operations are not maintained. However, the
6 DWTP documentation identifies the training requirements pertaining to these personnel.

- 7
8 2. -330(2)(b): "A written description of the type and amount of both introductory and continuing
9 training required for each position."

10
11 Description: In addition to the discussion provided in Section 8.1, courses developed to comply with
12 the introductory and continuing training programs are identified and discussed in the DWTP
13 documentation. The frequency for retraining is specified in the DWTP documentation.

- 14
15 3. -330(2)(c): "Records documenting that personnel have received and completed the training required
16 by this section. The Department may require, on a case-by-case basis, that training records include
17 employee initials or signature to verify that training was received."

18
19 Description: Training records are maintained consistent with DOE/RL-91-28, Section 8.3.

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**Hanford Facility RCRA Permit Modification Notification Forms
for
Part III, Chapter 5 and Attachment 35
242-A Evaporator**

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Page 2 of 2: Chapter 8

Hanford Facility RCRA Permit Modification Notification Form

Unit: 242-A Evaporator	Permit Part & Chapter: Part III, Chapter 5 and Attachment 35			
<u>Description of Modification:</u>				
Remove and replace Chapter 8.0 with attached. Hanford Facility RCRA Permit, Rev. 5, page 50 of 84, line 20: Chapter 8.0 Personnel Training, from Class 1 Modification dated September 1999.				
Remove Appendix 8A, all information required is contained in the revised Chapter 8. Hanford Facility RCRA Permit, Rev. 5, page 50 of 84, lines 33-35: Appendix 8A — 200 Area Liquid Waste Processing Facilities Administrative Policies, Dangerous Waste Training Plan from Class 1 Modification for quarter ending June 30, 1998				
Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:				X*
Relevant WAC 173-303-830, Appendix I Modification: WAC-173-303-830(4)(d) Other modifications.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>				
* This modification is being submitted as a Class 3 requesting that it be reviewed and approved as a Class 1 modification.				
Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:	
J. D. Williams Date	C. J. Bosted Date	R. J. Julian Date	L.E. Ruud	Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit
Part III, Chapter 5 and Attachment 35
242-A Evaporator

Replacement Chapter

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Chapter 8