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PFP Dangerous Waste Training Plan

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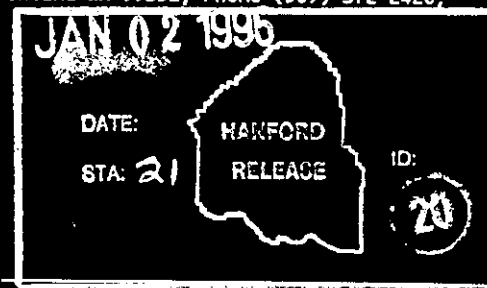
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Abstract: This document establishes the minimum training requirements for the PFP personnel who are responsible for management of dangerous waste. The training plan outlines training requirements for handling of solid dangerous waste during generator accumulation and liquid dangerous waste during treatment and storage operations.

The implementation of this training plan will ensure the PFP facility compliance with the training plan requirements of Dangerous Waste Regulation, Chapter 173-303-330, Washington Administrative Code (WAC). The requirements for such compliance is described in Section 11.0 of WHC-CM-7-5, Environmental Compliance Manual.

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Dangerous Waste Management Training Plan

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**PLUTONIUM FINISHING PLANT
DANGEROUS WASTE TRAINING PLAN**

1.0 INTRODUCTION

1.1 BACKGROUND

The major processing facilities at the Plutonium Finishing Plant (PFP) include the Plutonium Reclamation Facility (PRF) and the Remote Mechanical 'C' (RMC) Line. The facilities were used to treat, stabilize, and recover plutonium from scrap solutions and solids. The facilities generated large quantities of solid and liquid waste as a result of those activities. Now, the facilities are in standby mode awaiting clean out and stabilization as a part of the PFP's current mission. However, small quantities of hazardous waste are still being generated in the course of current plutonium stabilization, maintenance and decontamination efforts. The PFP Analytical and Plutonium Process Support Laboratories also generate various quantities of hazardous waste in supporting the PFP's mission.

Hazardous waste generated as a result of the PFP's activities is managed in the following manner: Solid hazardous wastes are accumulated in satellite and <90-day accumulation areas prior to being transported for interim storage and/or ultimate disposal. Liquid wastes are stored and treated in the 241-Z Waste Storage and Treatment Facility prior to being transferred to the Tank Farms for further treatment and storage. The 241-Z Facility is the sole Treatment, Storage, and Disposal (TSD) waste management unit operated by the PFP. As a hazardous waste generator and operator of a TSD facility, the PFP is subject to numerous federal, state, and the U.S. Department of Energy regulations. The regulations are designed to ensure that hazardous waste is identified, safely managed, and properly treated and disposed.

The Resource Conservation and Recovery Act (RCRA) is the federal program for proper management of hazardous waste. The RCRA waste management program sets forth the regulatory standards for monitoring and controlling hazardous waste from generation, transportation, storage, treatment, through the disposal stages. The requirements of RCRA are contained in Title 40 Code of Federal Regulation (40 CFR), and are enforced by the Environmental Protection Agency (EPA) on the national level. As an authorized state, Washington State has its own EPA-approved hazardous waste program which is administered by the Washington State Department of Ecology (Ecology). The provisions of the state's waste management program are contained in the "Dangerous Waste Regulations," Chapter 173-303 of Washington Administrative Code (WAC). This program consists of the RCRA core program and is used in this document to denote the dangerous waste training required by WAC 173-303-330.

1.2 OBJECTIVE

The PFP personnel who are engaged in the management of hazardous waste are required by law to be properly trained in waste management procedures appropriate to their positions. The purpose of the training is to ensure that those personnel can perform their duties in a safe, effective, and environmentally sound manner.

Accordingly, this document was developed to establish the minimum training requirements to satisfy the above-mentioned objectives. The focus of the training plan is directed toward the proper handling of solid dangerous waste during generator accumulation and liquid dangerous waste during treatment and storage operations. The plan implements the training requirements for management of dangerous waste described in Environmental Compliance Manual (ECM), WHC-CM-7-5, Section 11. The intent of the training plan is to ensure that:

- a. The PFP facility personnel are properly trained to perform their duties in a manner that ensures facility compliance with respect to the requirements of "Dangerous Waste Regulations," Chapter 173-303 of the WAC.
- b. The PFP facility personnel are properly trained in dangerous waste management procedures appropriate to their positions and are trained to respond effectively to emergencies.

1.3 SCOPE

This document implements the training requirements for the management of hazardous waste specified in WHC-CM-7-5, Section 11. In doing so it will also fulfill the requirements of WAC-173-303-330(2) for development of a written training plan that must be kept at the PFP facility.

This training plan is applicable to the PFP personnel and the hazardous waste generated within the PFP. The main focus of training will be on those personnel who manage dangerous waste at satellite and <90-day accumulation areas, and the 241-Z Waste Treatment and Storage Facility. Other personnel, such as in maintenance, the PFP Laboratories, are considered waste generators and will receive training appropriate to their level duties and responsibility.

The training plan has two components, a written plan and a roster. The roster will contain the names of those employees who manage waste at <90-day area, and the 241-Z Waste Treatment and Storage Facility. Such employees are classed as Advanced Worker and General Manager described in Section 3.0. The training requirements for waste generators who are classed as All Employee or General Worker are provide in Table 3.3 of Section 3.0. However, the names of those employees are not required to be in the roster. Hazardous waste generated by contractors within the PFP will be handled by the contractors under the supervision of PFP Solid Waste Operations, however, their training is the responsibility of the contracting organization.

The RCRA training matrices for those who perform, or supervise others to perform, tasks associated with waste management for <90-day accumulation areas or the 241-Z Tank system are provided in Section 3.0. The description for the associated training courses are included in the Appendix.

2.0 TRAINING PROGRAM

As described in Section 11 of Environmental Compliance Manual, WHC-CM-7-5, the RCRA training program uses a graded approach to training based on DOE orders and federal and state regulations. The training program is divided into five areas: orientation, awareness, advanced, administration, and job specifics. The orientation, awareness, and advanced are further divided into general and specific training categories. The training needs are evaluated continually and revised as necessary with respect to current facility needs and regulatory requirements.

Duties and responsibilities assigned to personnel are identified and evaluated to determine training requirements. Training requirements are listed in the training matrices in Section 3.0. The training matrices are designed to assist the managers of facilities in identifying their personnel training requirements and to ensure those individuals receive training appropriate with their duties.

Within each group or facility the position titles and position descriptions, including education, skills, qualifications, and duty requirements for those positions are identified. This document is considered an element of PFP's regulatory file and therefore subject to public access and review. However, the training roster developed, based on the training matrices listed in Section 3.0, will be separate from this document and will be available for review by the regulatory agencies. The training roster containing employees name must be updated quarterly to ensure that personnel training status remains current. The training plan and the training roster will be maintained by the training manager.

2.1 TRAINING FREQUENCY

New employee training is completed within the first 6 months of assignment to the PFP facility. Untrained employees are not allowed to work at PFP without supervision by a trained employee. After completing initial training, employees may need to receive annual refresher training for RCRA courses to meet continuing training requirements. In some cases, the training course is only required on a one-time-only basis, and in other cases, refresher training is provided every other year. When the frequency of refresher training is other than annual, then the frequency will need to be justified. The training manager and the managers of each facility will ensure that their employees are trained and their certifications are maintained.

2.2 TRAINING RECORDS

2.2.1 Location of Training Records

Training records, required by WAC 173-303-330, consist of documentation showing that the required level of training described in Section 3.0 of this document is completed. Hanford Site training records include both electronic data storage and hard copies. The electronic data storage information is the training record initially presented to demonstrate that personnel at PFP have been trained. After a course is completed, the electronic data storage record is created on the training record information (TRI) system. The electronic data storage record will contain the course number, course title, date of attendance, and any refresher dates.

Hard copies of training records that are sent to the training record organization for entry onto the TRI system are initially maintained in Richland, Washington. Original hard copy training records are transferred quarterly to the Records Holding Area in Richland, Washington. After approximately 1 year, the original hard copy training records are archived at the Federal Records Center in Kent, Washington. Electronic data storage and hard copy training records on former employees are kept for at least 3 years from the date the employee last worked at the PFP.

2.2.2 Access of Training Records

When a training record is requested during an inspection by a regulatory agency, the training manager will provide either an electronic or a hard copy to satisfy the inspection concern. Training records on former employees may not be available for normal users and may require the assistance from a representative from the training records organization to access the TRI system for the information.

2.2.3 Determining Current Training Status

The training record for each person can be compared to the training matrices provided in Section 3.0 for compliance. The electronic data storage training record coupled with this training plan should enable an inspector to determine the training status of personnel in the field. Due to the potential for delays in entering electronic data records into the database, it may be necessary to refer to hard copy records for recently completed training.

2.3 RESPONSIBILITIES

The PFP training manager is responsible for maintaining the dangerous waste training plan. However, it is expected that the facility managers whose personnel must be trained according to this plan will provide adequate support to the training manager for the development and implementation of the training plan. Generally, the PFP training manager will be the point of contact between the Hanford Site training, Environmental Services, and the PFP managers. The PFP Environmental Engineering group will provide support in evaluating the adequacy of the training program with respect to changing environmental regulations. Solid waste operations, process operations, and the laboratory managers actively participate in the maintenance of the training plan. The following delineates specific responsibility to each manager involved in this process.

2.3.1 PFP Training Manager

The manager will be responsible for the following; however, some or part of such responsibilities may be assigned to others by the manager as necessary.

1. Design, develop, and maintain a training program for the PFP. This may include identifying training courses, on-the-job training requirements, and maintaining computerized training record files.
2. Submit all hard copy training records defined as RCRA training records to Training Records for entry into the TRI System.
3. Track refresher training requirements and maintain current training rosters for PFP personnel.
4. Administer the Operator Training Program in accordance with WHC-CM-5-8, Section 2.32.
5. Conduct periodic evaluations and self-assessments of training materials and the programs, and provide responses to surveillances, audits, and external assessments.

2.3.2 PFP Environmental Compliance Officer (ECO)

The ECO will support and provide guidance for waste management activities. The support may include periodic monitoring and evaluating the adequacy of the RCRA training program with respect to WAC 173-303, and WHC-CM-7-5.

2.3.3 RCRA Support Organizations

The RCRA support organizations have the following responsibilities:

2.3.3.1 Environmental Services

1. Reviews and interprets training requirements with respect to the waste management regulations, and provides direction to the Hanford Site Training group on training course content and course development needs.
2. Provides a subject matter expert to approve all general training program courses that provide instruction on regulations.
3. Determines offsite training equivalency according to the procedure outlined in WHC-CM-7-5, Section 11.

2.3.3.2 Site Training

The Hanford Site Training group develops the program of general training to meet Hanford Site-wide classroom instruction needs.

1. Develops, presents, and maintains the general classroom program for all Hanford Site-wide training (general training). Sends documentation of general training to Training Records in accordance with instructions in WHC-CM-2-15.
2. Supports the development of the mandatory training matrix (MTM) and training matrix (TM) by providing current environmental course information. Course information includes a description of objectives and the regulatory basis for the course.
3. Establishes Hazard Evaluation Workshop course material for the Facility Emergency and Hazard Information Checklist at the direction of Emergency Preparedness and Environmental Services.
4. Develops training courses based on direction received from Environmental Services for Hanford Site training needs.
5. Notifies all applicable personnel when RCRA training courses have been developed, and establishes a date 6 months from the notification when all targeted personnel must be trained.

3.0 PFP DANGEROUS WASTE TRAINING PLAN

The matrices provided in this section identify the training requirements for the PFP personnel who are classed as Advanced General Worker or General Manager described below. The trainings apply only to those Advanced General Workers and their immediate manager, who manage solid (hazardous or mixed) waste at <90-day accumulation areas, and/or manage liquid (hazardous or mixed) waste the 241-Z Tank System. Table 3.2 and Table 3.3 identify training courses for those classed as All Employee or General Worker. All Employee or General Worker may include personnel at PFP Analytical and Plutonium Process Support Laboratories, Maintenance, crafts personnel, support staffs, and others who routinely generate (solid or liquid) hazardous or mixed waste. The PFP managers will train their personnel meeting the All Employee and General Worker classification according to the training courses listed in Table 3.2 and Table 3.3, when appropriate. However, no training roster is required or maintained for All Employee or General Worker.

The matrices for Advanced General Workers and General Managers are specifically designed for groups, rather than worker categories, in order to simplify and assist the managers of those groups in identifying the qualification and the training requirements of those positions. In addition to the training requirements described in the matrices, the manager may designate additional training requirements to accommodate specific worker duties. The PFP Training Manager may use the matrices shown in this Section to develop training roster(s) either by group, as shown in this section, or can develop one based on worker categories. The training roster containing employee names is separate from this document and is updated quarterly by the training manager to ensure that personnel training status remains current.

This section also provides a brief description of the position titles and description, qualifications, and duty requirements for each group. RCRA courses, and their mandating regulatory documents, are referenced in Section 3.2. Worker categories with respect to the waste management program are briefly described below.

3.1 WORKER CATEGORIES

All Employees: Facility personnel who are not involved in the generation or management of dangerous waste. Most of the personnel categorized as All Employees are in administrative or support groups.

General Worker: Facility personnel whose duties may be limited to the generation and placement of dangerous or mixed waste into pre-approved containers. The duties may also include completing entries on container inventory sheets, marking or labelling at the direction of Advanced General Worker, General Manager or Supervisor, and movement or loading of waste containers onto trucks in the satellite area.

Advanced General Worker: Facility personnel who manage dangerous or mixed waste. Their duties may include inspection, determining marking and labelling requirements of waste containers. Advanced General Workers typically have responsibility to act and/or notify PFP operations management when an incident occurs which requires immediate response, such as a spilled container or process upset. The responsibility of Advanced General Workers assigned to the 241-Z Tank System may include daily inspections for proper operations of the Tank System and its ancillary equipments that has no secondary containment. The 241-Z tank System is considered as a critical system, whose failure could lead to the release of dangerous waste into the environment.

General Manager: Managers and engineers can be classified as General Managers if their involvement in waste management requires such a classification. The managers and engineers may have similar responsibilities and are required to take the same courses. The managers in this category may include (1) personnel who act as the Emergency Coordinator or alternate(s), (2) the ECO, and (3) managers of Advanced General Workers (i.e., operations managers). Personnel who direct General Worker or Advanced General Worker (Group Leaders) may also be considered as General Managers due to their supervisory responsibilities.

General Shipper: Personnel who sign waste documentation for onsite transfer and offsite shipment of dangerous or mixed waste on roadways, are considered as General Shippers. The shipper prepares and signs documents such as Uniform Hazardous Waste Manifests.

3.2 TRAINING COURSES

As described in WHC-CM-7-5, the RCRA training program is divided into five program areas: orientation, awareness, advanced, administration, and unit/job specific. Three of these program areas orientation, awareness, and advanced are further divided into general training and unit/building-specific training sub-areas. The unit/job-specific program area is designed to be used in conjunction with the advanced program area to aid in meeting the unit/building-specific sub-area training needs.

Tables 3.2 and 3.3 provide a snapshot of the RCRA training requirements, which were used in the development of the training matrices. Table 3.2 shows the relationship between worker categories and waste management programs. Table 3.1 lists RCRA and DOE directed training courses for use as a reference in conjunction with the training matrices presented in Section 3.3. The courses were identified by (1) the Dangerous Waste Regulations WAC 173-303, (2) the Hanford Facility RCRA Permit, (3) correspondence between RL and Ecology on dangerous waste training, and (4) PFP Facility specific training requirements.

General Training Courses.

Table 3.1

| Course No. | Course Description | Mandating Document |
|------------|---|---|
| 02006G | Hazard Communication & Waste Management Awareness | 29 CFR 1910.1200, RCRA II.C.4, WMC-CM-7-5, Section 11.6.2.2 |
| 020159 | Advanced Course 2 - Hazardous Waste Shipper Certification | 173-303-330(1), -180, -190 |
| 020288 | Building Emergency Director Training | 173-303-330(1), -340, -350, -360 |
| 035010 | Waste Designation | 173-303-070, -080 thru -100 |
| 035020 | Facility Waste Sampling and Analysis | 173-303-110, -070, -300 |
| 035100 | Core Waste Management Training - Initial | 173-303-330, -200, -630 |
| 035110 | Core Waste Management Training - Re-qualification | 173-303-330, -200, -630 |
| 035120 | Waste Management Administration - Initial | 173-303-330, -200, -210, -220, -380, -630 |
| 035130 | Waste Management Administration - Re-qualification | 173-303-330, -200, -210, -220, -380, -630 |
| 037510 | Building Emergency Director/Building Warden Re-qualification | 173-303-330, -340, -350, -360 |
| 03E043 | Building Contingency Plan/Hazard Communication/Emergency Preparedness Training PFP Facility | 173-303-330(1)(d), -340, -350, -630, and 29 CFR 1910.1200 |
| 200130 | PFP General Plant Operators Certification | DOE Order 5480.20A, WMC-CM-5-8, WMC-2-15 |
| 200140 | PFP Solid Waste Operators Certification | DOE Order 5480.20A, WMC-IP-1121 |
| 200145 | PFP Non-Radioactive Hazardous Waste Operator Certification | DOE Order 5480.20A, 40 CFR, 49 CFR, WMC-CM-2-15 |
| 200170 | PFP Surveillance Operator Certification | DOE Order 5480.20A, WMC-CM-5-8 |
| 200230 | PFP Effluent Transfer Operator Certification | DOE Order 5480.20A, WMC-IP-0859, WMC-IP-1121 |
| 200330 | PFP Facility Emergency Procedure/Abnormal Plant conditions (Managers & Engineers) | DOE Order 5480.20A, WMC-IP-1121 |
| 200560 | PFP Shift Managers Certification | DOE Order 5480.20A, WMC-IP-1121 |
| 200610 | PFP Environmental Waste Operations - Managers | DOE Order 5480.20A, WMC-IP-1121 |
| 200600 | PFP Facility Emergency Procedure/Abnormal Plant conditions (Operators) | DOE Order 5480.20A, WMC-CM-2-15 |
| 200700 | PFP Building Orientation | DOE Order 5480.20A, Sec 7, (e) 2&3 |

Table 3.2 Relationship Between Worker Categories and Waste Management Program Areas.

| Worker Categories (DHC 04-7-5, Sec. 11) | Waste Mgmt. Orientation | Waste Mgmt. Orientation Unit/Job Specific | Waste Mgmt. Awareness | Waste Mgmt. Awareness Unit/Job Specific | Waste Mgmt. Advanced | Waste Mgmt. Advanced Unit/Job Specific | Waste Mgmt. Administ. | ISO Unit Job/Facility Specific |
|--|----------------------------|--|--------------------------|--|-------------------------|---|--------------------------|--------------------------------------|
| All Employee | X | X ¹ | | | | | | |
| General Worker | X | X ¹ | X | X | | | | |
| Advanced General Worker | X | X | X | X | X | X | | X ² |
| General Manager | X | X | X | X | X | X | | X ² |
| General Shipper | X | X | X | X | | | X | |

X = Applicable
 1 = As applicable
 2 = As applicable, based on applicability of DOE Order 5480.20 to unit/building

Table 3.3 identifies the required RCRA training courses with respect to worker categories.

Table 3.3 Applicability of Training Courses to Worker Categories.

| Courses Courses/Refresher | All Employees | General Worker | Advanced General Worker | General Manager | General Shipper |
|------------------------------|------------------|-------------------|-------------------------------|--------------------|--------------------|
| 02006G | | X | X | X | X |
| 035100/035110 | | | X | X | |
| 020288/037510 | | | | X | |
| 035120/035130 | | | | | X |
| 035010 | | | | | X |
| 03E043 | | | X | X | X |
| 035020 | | | | | X |
| 020159 | | | | | X |
| 200145 | | | X | | |
| 200700 | X | X | X | X | X |
| 200600 | | | X | | |
| 200330 | | | | X | |
| 200130 | | | X | | |
| 200140 | | | X | X | |
| 200170 | | | X | | |
| 200230 | | | X | | |
| 200560 | | | | X | |
| 200610 | | | | X | |

3.3 PFP OPERATIONS MANAGER

Manager (General Manager): The manager provides direction to operate PFP, and is responsible for conducting activities at PFP necessary to achieve and maintain environmental compliance. The managers of Solid Waste Operations, and Shift Managers who operate and maintain 241-Z Tank System, report to this manager. The manager should maintain a current knowledge of dangerous waste generation, storage, transportation, and related safety regulations.

3.3.1 Solid Waste Operations

Manager (General Manager): The manager reports to the PFP Operations Manager, and ensures that all hazardous and mixed waste are handled in accordance with applicable state and federal regulations, and company policies.

The person in this position will direct activities at the PFP satellite accumulation/less than 90-day storage areas, and ensures compliance with RCRA regulations relating to the inspection, characterization, accumulation, packaging, handling, and storage of solid hazardous and mixed waste from generation to shipment. The manager must maintain a current knowledge of dangerous waste generation, storage, transportation, and related safety regulations.

The educational requirement for this position is a Bachelor of Science (B.S.)/Bachelor of Arts (B.A.) degree in a technical or administrative field. Equivalent years of education and experience may be substituted with management's approval. This position requires a working knowledge of nuclear, radiological safety, environmental compliance, safeguards and security requirements, labor relations, and operations management. Training requirements for this position are listed in Section 3.3.1.1.

Shipper (General Shipper): The Shipper prepares, schedules, and signs the Uniform Hazardous Waste Manifest along with other shipping documents required to ship hazardous and mixed waste to onsite or offsite waste storage/disposal facilities. In addition to the training requirements listed in Section 3.3.1.1, the shipper shall have Hazardous Waste Shipment Certification. A high school diploma is the minimum educational requirement for this position. However, a B.S./B.A. in a technical or administrative field is preferred.

Solid Waste Operators/Nuclear Operator (Advanced General Worker): The Solid Waste Operators report to the Solid Waste Operations Manager. The operators perform and support activities associated with the characterization, packaging, and gathers information to facilitate shipping of hazardous, and radioactive mixed waste generated at the PFP. The Operators also respond to or notify management of situations requiring immediate action, such as a hazardous waste spill.

The minimum educational requirement for Solid Waste Operators is a high school diploma or the equivalent. The operators must complete all general access and job-specific certifications necessary to perform their duties. The training requirements for Solid Waste Operators is provided in Section 3.3.1.1.

3.3.1.1 Solid Waste Operations Training Matrix

| Course | Frequency | Refresher | Manager | Stripper | Operator |
|--------|-----------|-----------|---------|----------|----------|
| 02006G | One Time | None | X | X | X |
| 035100 | 12 Months | 035110 | X | X | X |
| 035120 | 12 Months | 035130 | | X | |
| 035010 | 12 Months | 035010 | | X | |
| 035020 | One Time | None | | X | |
| 03E043 | 12 Months | 03E043 | X | X | X |
| 200700 | 24 Months | 200700 | X | X | X |
| 200145 | 24 Months | 200145 | | X | X |
| 200610 | 24 Months | 200610 | X | | |
| 200140 | 24 Months | 200140 | X | | X |
| 020159 | 24 Months | 020159 | | X | |

3.3.2 241-Z TANK SYSTEM

Shift Manager (Team Leader/General Manager): The manager in this position reports to the PFP Operations Manager, and supervises nuclear operators as they manage liquid wastes in 241-Z Tank Systems. The manager functions as a Building Emergency Director (BED)/alternate(s) or as the Emergency Coordinator defined in WAC 173-303-360. As a BED, the manager ensures that the RCRA contingency plan is implemented during the course of an incident or process upset, and ensures that all reports to the Washington State Department of Ecology are made after an incident or process upset. The manager must be thoroughly familiar with the PFP facility contingency plans, operations, activities, location and properties of all wastes handled, location of all records for the PFP facility layout.

A B.S./B.A. in a technical field such as engineering or physical sciences is desirable; however, equivalent years of experience and education may be substituted with approval.

Nuclear Process Operator/Nuclear Operator (Advanced General Worker): Plutonium Operation Operators perform work as Nuclear Process Operators and Nuclear Operators. Their duties include the management of liquid wastes in the 241-Z waste tanks. As an Advanced General Worker they may generate solid hazardous waste and place it in a pre-approved container, and may inspect, package, label, and move hazardous waste containers.

Nuclear Operators must have a high school diploma or equivalent. Each person in this position must complete all general access and job specific certifications necessary to perform their assigned work.

3.3.2.1 PFP Operations Training Matrices

| Course No. | Frequency | Refresher | Shift Manager | Nuclear Operator |
|------------|-----------|-----------|---------------|------------------|
| 02006G | One Time | None | X | X |
| 200700 | 24 Months | 200700 | X | X |
| 200600 | 24 Months | 200600 | | X |
| 200130 | 24 Months | 200130 | | X |
| 200170 | 24 Months | 200170 | X | X |
| 200230 | 24 Months | 200230 | X | X |
| 200560 | 24 Months | 200560 | X | |
| 200330 | 24 Months | 200330 | X | |
| 02028B | 12 Months | 037510 | X | |
| 03E043 | 12 Months | 03E043 | X | X |

3.4 TRANSITION PROJECTS PROCESS OPERATIONS

Manager (General Manager): The manager in this position may have many different responsibilities, one of which is to supervise shift managers (or Team Leaders), who are responsible for managing nuclear and nuclear process operators as they manage liquid wastes in the 241-Z waste tanks.

Shift Managers (Team Leader/General Manager): The manager in this position reports to the Transitions Project Manager, and supervises nuclear operators as they manage liquid waste in 241-Z Tank System. The manager functions as a Building Emergency Director (BED)/alternate(s) or as the Emergency Coordinator defined in WAC 173-303-360. As a BED, the manager ensures that the RCRA contingency plan is implemented during the course of an incident or process upset, and ensures that all reports to the Washington State Department of Ecology are made after an incident or process upset. The manager must be thoroughly familiar with the PFP facility contingency plans, operations, activities, location and properties of all wastes handled, and location of all records for the PFP facility layout.

A B.S./B.A. in a technical field such as engineering or physical sciences is desirable; however, equivalent years of experience and education may be substituted with approval.

Nuclear Process Operator/Nuclear Operator (Advanced General Worker): Plutonium Operation Operators perform work as Nuclear Process Operators and Nuclear Operators. The training matrix provided in this applies only to those Nuclear Operators whose duties include the management of liquid wastes in the 241-Z waste tanks. As an Advanced General Worker, they may generate solid hazardous waste and place it in a pre-approved container, and may inspect, package, label, and move hazardous waste containers.

Nuclear Operators must have a high school diploma or equivalent. Each person in this position must complete all general access and job specific certifications necessary to perform their assigned work.

3.4.1 Projects Transition Process Operations Training Matrices

| Course No. | Frequency | Refresher | Shift Manager | Nuclear Operator |
|------------|-----------|-----------|---------------|------------------|
| 02006G | One Time | None | X | X |
| 200700 | 24 Months | 200700 | X | X |
| 200600 | 24 Months | 200600 | | X |
| 200130 | 24 Months | 200130 | | X |
| 200170 | 24 Months | 200170 | X | X |
| 200230 | 24 Months | 200230 | X | X |
| 200560 | 24 Months | 200560 | X | |
| 200330 | 24 Months | 200330 | X | |
| 02028B | 12 Months | 037510 | X | |
| 03E043 | 12 Months | 03E043 | X | X |

4.0 REFERENCES

- WAC 173-303, 1993, "Dangerous Waste Regulations," *Washington Administrative Code*, as amended.
- 29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response," *Code of Federal Regulations*, as amended.
- 29 CFR 1910.1200, "Hazard Communication," *Code of Federal Regulations*, as amended.
- DOE Order 5480.20, *Personnel Selection, Qualification, Training and Staffing Requirements at DOE Reactor and Non-Reactor Nuclear Facilities*, U.S. Department of Energy, Washington, D.C.
- DOE-RL, 1993, *Hanford Facility Contingency Plan*, DOE/RL-93-75, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- Ecology, EPA, and DOE, 1994, *Hanford Federal Facility Agreement and Consent Order, Fourth Amendment*, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington.
- Resource Conservation and Recovery Act of 1976*, 42 USC 6901, et seq.
- WHC-CM-2-14, *Hazardous Material Packaging and Shipping*.

APPENDIX

RCRA TRAINING PROGRAM COURSE DESCRIPTIONS

The following list of courses constitutes the Resource Conservation and Recovery Act (RCRA) training program courses as determined by (1) the Dangerous Waste Regulations WAC 173-303, (2) the Hanford Facility RCRA Permit, and (3) correspondence between the U.S. Department of Energy (DOE), Richland Operations Office (RL) and Washington State Department of Ecology (Ecology) on dangerous waste training. The course descriptions within this attachment are to be used and placed within unit/building-specific training plans.

General Training Courses

000001 Hanford General Employee Training
 02006A Hanford Site Orientation
 02006G Hazard Communication and Waste Management Awareness
 020159 Advanced Course 2 - Hazardous Waste Shipper Certification
 02028B Building Emergency Director Training
 035010 Waste Designation
 035020 Facility Waste Sampling and Analysis
 035100 Core Waste Management Training - Initial
 035110 Core Waste Management Training - Re-qualification
 035120 Waste Management Administration - Initial
 035130 Waste Management Administration - Re-qualification
 037510 Building Emergency Director/Building Warden Re-qualification

Unit/Building Specific Courses

03E043 PFP contingency plan/hazard communication/emergency preparedness training.

PFP Facility Specific Training Courses

200700 PFP Facility Orientation
 200600 PFP Facility Emergency Procedure/Abnormal Plant conditions (operators)
 200330 PFP Facility Emergency Procedure/Abnormal Plant conditions (Managers & Engineers)
 200130 PFP General Plant Operators Certification
 200140 PFP Solid Waste Operators Certification
 200610 PFP Environmental Waste Operations - Managers
 200145 PFP Non-Radioactive Hazardous Waste Operator Certification
 200170 PFP Surveillance Operator Certification
 200230 PFP Effluent Transfer Operator Certification
 200560 PFP Shift Managers Certification

APPENDIX

GENERAL TRAINING COURSES

| Title | 000001 Hanford General Employee Training |
|-----------------------|--|
| Description | Course covers DOE Orders and applicable policies pertaining to employer and employee rights and responsibilities, general radiation training, hazard communications, dangerous waste, fire prevention, personal protective equipment, safety requirements, certain unit/building orientation refresher training, emergency preparedness, accident reporting, and avenues for addressing safety concerns. The RCRA training program identifies this course as a program element as an annual refresher to the Hanford Facility RCRA permit condition concerning training. |
| Mandating Document(s) | Hanford Facility RCRA Permit, General Condition II.C |
| Target Audience | All Hanford Facility personnel. Subcontractors working on the Hanford Facility more than one-year. |
| Delivery | Computer-based training with interactive video. |
| Evaluation | Computer generated questions. |
| Length | Average = 2 to 4 hours. |
| Frequency | Annual |

| Title | 02006A Hanford Site Orientation |
|-----------------------|--|
| Description | Course covers DOE Orders and applicable policies pertaining to employer and employee rights and responsibilities, general radiation training, hazardous waste, fire prevention, personal protective equipment, safety requirements, accident reporting, and avenues for addressing safety concerns. The RCRA training program identifies this course as a program element due to the Hanford Facility RCRA permit condition concerning training. |
| Mandating Document(s) | Hanford Facility RCRA Permit, General Condition II.C |
| Target Audience | All Hanford Facility personnel. |
| Delivery | Computer based training with interactive video. |
| Evaluation | Computer generated questions. |
| Length | 3 hours |
| Frequency | Initial only (Retrained annually by 000001 HGET). |

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|------------------------------|---|
| Title | 02006G Hazard Communication and Waste Management Awareness (formerly Generator Hazards Safety Training) |
| Description | Course introduces workers to federal laws governing chemical safety in the work place. The course provides the hazardous material/waste worker with the basic fundamentals for safe use of hazardous materials and accumulation of hazardous waste in containers. The concepts covered in this course instruct personnel on specific waste generation procedures and requirements which include: (1) Pertinent waste management issues (e.g. waste categories, initial accumulation container management requirements, and waste segregation practices)(2) proper responses to incidents pertaining to the waste in the initial accumulation containers, (3) proper responses to dealing with waste of unknown origins, and (4) proper responses to questions posed in the field concerning the above elements. |
| Mandating Document(s) | 29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063 Hanford Facility RCRA Permit, General Condition II.C.4 |
| Target Audience | Hanford Facility personnel categorized as a General Worker, Advanced General Worker, General Manager, and General Shipper. Other courses may provide equivalent training so that credit for this course is provided when the electronic data storage training record is generated. |
| Delivery | Classroom |
| Evaluation | Written examination - 80% passing grade. |
| Length | 4 hours |
| Frequency | One-time-only. Justification: The initial accumulation of waste can be conducted under satellite accumulation area provisions in WAC 173-303-200(2), during a project where the 90-day accumulation period starts when the waste is first placed into a container, or inside an Area Of Contamination during CERCLA or RCRA part practice activities. In these instances, compliance with WAC 173-303-330 is not required. Therefore, annual refresher training is not required and unit/building specifics are adequately covered through the 03E500 course or equivalent. |

| | |
|------------------------------|--|
| Title | 020159 Advanced Course 2 - Hazardous Waste Shipper Certification |
| Description | Course introduces General Shippers to identify shippers' responsibilities and liabilities with regard to compliance to manifesting requirements and DOT regulations, including placarding, identifying proper shipping names and loading requirements. |
| Mandating Document(s) | WAC 173-303-330(1), -180, -190, and -370, Hanford Facility RCRA Permit. |
| Target Audience | General Shippers of dangerous or mixed waste on roadways anywhere on the Hanford Facility. |
| Delivery | Classroom |
| Evaluation | Written examination - 80% passing grade. |
| Length | 3 days |
| Frequency | Every other year. (See WHC-CM-2-14 for the DOT courses that are prerequisites for this course). |

APPENDIX

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|------------------------------|--|
| Title | 020288 Building Emergency Director Training |
| Description | Course provides an overview of the responsibilities of the Building Emergency Director, identifies the building emergency organizations, actions required during an event, implementing the contingency plan, and discusses drill and exercise requirements. |
| Mandating Document(s) | WAC 173-303-330(1), -340, -350, and -360 |
| Target Audience | Hanford Facility personnel categorized as General Managers because they perform the responsibilities of a RCRA Emergency Coordinator through the WHC title of Building Emergency Director or alternate. The BED can function over TSD units or generator activities. |
| Delivery | At the BED office. |
| Evaluation | Performance Evaluation. |
| Length | 2 hours |
| Frequency | Initial (Retrained annually by 037510 Building Emergency Director/Warden Re-qualification) |

| | |
|------------------------------|--|
| Title | 035010 Waste Designation |
| Description | Course teaches dangerous waste designation according to WAC 173-303. Class content includes section-by-section lecture on the regulations, with examples following each section. Students complete examples using a waste designation flow chart. Examples addressed include: federal listed waste, discarded chemical products, dangerous waste source, Washington State criteria: toxicity, persistence, carcinogenic, and federal characteristics: ignitability, corrosivity, reactivity, and toxicity. |
| Mandating Document(s) | WAC 173-303-070, and -080 through -100 |
| Target Audience | General Shippers. |
| Delivery | Classroom. |
| Evaluation | Written Exam - 80% passing grade. |
| Length | 8 Hours |
| Frequency | Annual |

| | |
|------------------------------|---|
| Title | 035020 Facility Waste Sampling and Analysis |
| Description | Course presents waste sampling methodologies according to EPA Protocols SW-846, Test Methods for Evaluating Solid Waste Physical/Chemical Methods. This course also covers documentation requirements in a sampling plan, field and laboratory quality control/assurance, and use of actual sampling equipment as specified by WAC 173-303-110. |
| Mandating Document(s) | WAC 173-303-330(1), -070, -110, and -300 |
| Target Audience | General Shippers |
| Delivery | Classroom presentation, exercises, demonstration and discussion |
| Evaluation | Written Examination - 80% passing grade |
| Length | 12 hours |
| Frequency | One time only In most cases on the Hanford Facility, the General Shipper will utilize resources from outside organizations to physically acquire samples. In addition, the General Shipper will also rely on the review and approval process for the development and issuance of Sampling and Analysis Plans regarding a sampling effort. This training provides an overview of information to ensure that sampling efforts are properly arranged for and planned. |

APPENDIX

| Title | 035100 Core Waste Management - Initial |
|-----------------------|--|
| Description | <p>Course covers general training requirements pertaining to waste management in container at 90-day accumulation areas and TSD units. The course incorporates WAC 173-303-630, DOE Orders, and WHC policy for container management. Includes practical exercises for hands-on experience with the packaging of dangerous or mixed waste, and preparation of packages for final destination.</p> <p>This course does not cover waste management aspects pertaining to other RCRA waste management units such as tank systems, surface impoundments, containment buildings, landfills, etc.</p> |
| Mandating Document(s) | WAC 173-303-330, -630, -200(1) and Waste Minimization |
| Target Audience | Advanced General Workers and General Managers categorized because they are immediate managers of Advanced General Workers who manage containers of dangerous or mixed waste. |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 16 Hours |
| Frequency | Initial only (refresher - 035110 Core Waste Management Training) |

| Title | 035110 Core Waste Management - Refresher |
|--------------------|--|
| Description | Refresher Course 035100 |
| Mandating Document | WAC 173-303-330, -630, -200(1), and waste minimization |
| Target Audience | Advanced General Workers and General Managers who are categorized because they are immediate managers of Advanced General Workers who manage dangerous or mixed waste in containers. |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 4 Hours |
| Frequency | Annual |

APPENDIX

| | |
|------------------------------|--|
| Title | 035120 Waste Management Administration - Initial |
| Description | Course is designed for personnel preparing to become shippers of dangerous and/or mixed waste. This course covers regulatory and company policies, forms, reports, forecasts, and plans. Topics also covered include: waste characterization, waste storage disposal request, low level waste storage/disposal record, transuranic waste storage/disposal record, and radioactive mixed waste attachment sheet. In addition, students will learn how these forms are used to complete shipping papers. |
| Mandating Document(s) | WAC 173-303-330, -630, -200, -210, -220, -380, and -390. |
| Target Audience | General Shippers |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 8 Hours |
| Frequency | Initial only (Refresher - 035130 Waste Management Administration) |

| | |
|------------------------------|---|
| Title | 035130 Waste Management Administration - Refresher |
| Description | Refreshes course 035120 |
| Mandating Document(s) | WAC 173-303-330, -630, -200, -210, -220, -380, and -390. |
| Target Audience | General Shippers |
| Delivery | Classroom |
| Evaluation | Written Examination - 80% passing grade |
| Length | 4 Hours |
| Frequency | Annual |

| | |
|------------------------------|--|
| Title | 037510 Building Emergency Director/Warden Re-qualification |
| Description | Refresher for Building Emergency Director Training and Building Warden Training. |
| Mandating Document(s) | WAC 173-303-330, -340, -350, and -360. |

| | |
|-----------------|---|
| Target Audience | General Managers categorized because they can act as the RCRA Emergency Coordinator in WAC 173-303-360. |
| Delivery | At the BED or BW office |
| Evaluation | Performance Evaluation |
| Length | 1 hour |
| Frequency | Annual |

APPENDIX

UNIT/BUILDING SPECIFIC COURSES

| | |
|-----------------------|--|
| Title | 03E043 Building-Specific contingency plan/hazard communication/emergency preparedness training O X-Z Facility (using the Facility Emergency and Hazard Information Checklist - form A-6000-784R) |
| Description | Course consists of a review of specific chemical hazards associated with each RCRA waste management unit and job assignment, as covered by a RCRA contingency plan. The training is completed by the supervisor, manager, or a designated individual using a checklist available on the Hanford Local Area Network under Jet Forms. The unit/building-specific information is reviewed concerning hazards in the work area and emergency response requirements, including where applicable, waste feed cut-off, communication and alarm systems, and response to fires. The training is completed by the immediate manager, or a designated individual using a checklist. The checklist acts as a guide to ensure consistent coverage of necessary topics. |
| Mandating Document(s) | WAC 173-303-330(1)(d), -340, -350, and -630. 29 CFR 1910.1200 |
| Target Audience | All Hanford Facility personnel categorized as Advanced General Workers, General Managers, and General Shippers. |
| Delivery | One-on-one or as a group with manager or designated individual. |
| Evaluation | Training checklist documentation. |
| Length | 1 hour |
| Frequency | Annual for each unique unit/building. |

APPENDIX

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|-------------------------------------|---|
| <p>Title</p> | <p>03E500 Unit/Building-Specific satellite accumulation area contingency actions and hazard communication training (using the Facility Emergency and Hazard Information Checklist)</p> |
| <p>Description</p> | <p>Course consists of a review of unit/building-specific hazardous chemical/materials and dangerous waste management practices associated with product use and the initial accumulation of waste in containers. The training is completed by the immediate manager, or a designated individual using the Facility Emergency and Hazard Information Checklist (FEHIC). When using the FEHIC in the Waste Management Awareness program area, refresher training is not required by regulation and is not provided. For that reason, the identification of where training at unique unit/buildings is received is not important and the same course number issued throughout the Hanford Facility. The 03E500 course supplements the 02006G course and is required whenever the target audience personnel will be working at a unit/building where waste segregation and initial waste accumulation practices are unique from previously received 03E500 training.</p> |
| <p>Mandating Document(s)</p> | <p>29 CFR 1910.1200 RL/USACE letter to Ecology responding to Consent Order No. DE 94NM-063 Hanford Facility RCRA Permit, General Condition II.C.4</p> |
| <p>Target Audience</p> | <p>All Hanford Facility personnel and unescorted subcontractors categorized as General Workers.</p> |
| <p>Delivery</p> | <p>One-on-one or as a group with supervisor, manager or designated PIC for each unique unit/building waste management practice.</p> |
| <p>Evaluation</p> | <p>Training checklist documentation</p> |
| <p>Length</p> | <p>1 hour</p> |
| <p>Frequency</p> | <p>At each unique unit/building where waste segregation and the initial accumulation of waste practices differ.</p> |

APPENDIX

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|------------------------------|--|
| Title | 200145 PFP Non-radioactive Hazardous Waste Operations. |
| Description | This course provides certification for Solid Waste Operators who are classified as Advanced General Worker or Shipper. The course provides instruction in the following areas: Inventory hazardous material; sample, package, and seal hazardous waste containers; sample clean-up spills and package PCB; inspect, package, and ship waste. |
| Mandating Document(s) | DOE Order 5480.20A, 40 CFR, 49 CFR, WHC-CM-2-15, WHC-IP-1121. |
| Target Audience | Solid Waste Operator, Hazardous Waste shippers. |
| Delivery | Classroom. |
| Evaluation | Written examination. |
| Length | 2 hours. |
| Frequency | 24 months |

| | |
|------------------------------|--|
| Title | 200610 PFP Environmental Waste Operations |
| Description | This training course provides information and documentation for certifying PFP Environmental Waste Operations Manager. |
| Mandating Document(s) | DOE Order 5480.20A, WHC-IP-1121 |
| Target Audience | Solid Waste Operations Manager |
| Delivery | At the PFP Training Center. |
| Evaluation | Examination, On-the-Job Training/Checklist. |
| Length | 40 Hours. |
| Frequency | 24 Months |

| | |
|------------------------------|---|
| Title | 200560 PFP Shift Manager Certification. |
| Description | This course provide training and documentation for certifying PFP Shift managers. |
| Mandating Document(s) | DOE 5480.20A, WHC-IP-1121 |
| Target Audience | Shift Managers. |

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|------------|---|
| Delivery | At the PFP Training Center. |
| Evaluation | Examination, On-the-job Training Checklist. |
| Length | 40 Hours. |
| Frequency | 24 Months. |

APPENDIX

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|-----------------------|---|
| Title | 200330 PFP Emergency Procedures/Abnormal Plant Conditions |
| Description | This is a self-study course provides instruction for managers and operating engineers on procedures, specifications, requirements, and bases affecting the proper response to and prevention of PFP emergency procedures and abnormal plant conditions. |
| Mandating Document(s) | DOE 5480.20A, WHC-IP-1121. |
| Target Audience | PFP Operations Managers and Engineers. |
| Delivery | Self-study. |
| Evaluation | Examinations. |
| Length | 24 Hours. |
| Frequency | 12 Months. |

| | |
|-----------------------|--|
| Title | 200600 PFP Emergency Procedures/Abnormal Plant Conditions (EP/APC) Operators. |
| Description | This training course provides information for certifying EP/APC knowledge for PFP nuclear operators. |
| Mandating Document(s) | DOE 5480.20A, WHC-CM-2-15. |
| Target Audience | Nuclear Process Operators. |
| Delivery | PFP Training. |
| Evaluation | Examinations. |
| Length | 24 Hours. |
| Frequency | 12 Months. |

| | |
|--------------|---|
| Title | 200700 PFP Facility Orientation. |
|--------------|---|

| | |
|-----------------------|--|
| Description | This is a required training for entering the PFP Facility. The course provides information on the PFP Emergency signal and responses, radiation, contamination control, zone entry, hazardous materials, emergency equipment, protective tags, personal conduct, and security. |
| Mandating Document(s) | DOE 5480.20A, Sec. 7, (e) 2 & 3, WHC-CM-5-8. |
| Target Audience | Everyone requiring unescorted access to the PFP. |
| Delivery | PFP Training - Video and Orientation/Briefing. |
| Evaluation | Course Completion Roster. |
| Length | 2.5 Hours. |
| Frequency | 24 Months. |

APPENDIX

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|------------------------------|--|
| Title | 200230 PFP Effluent Transfer Operations Certification. |
| Description | This training course provides documentation that nuclear operators performing effluent transfer at the PFP are certified. The training course covers operators responsibility, safety, equipment, acid transfers, slurping operations, and solution transfers to Tank Farms. |
| Mandating Document(s) | DOE 5480.20A, WHC-IP-0859, WHC-IP- 1121. |
| Target Audience | PFP-assigned nuclear operators who transfer liquid waste to Tank Farms. |
| Delivery | PFP Training. |
| Evaluation | Examination, On-the-job Checklist. |
| Length | 40 Hours. |
| Frequency | 24 Months. |

| | |
|------------------------------|--|
| Title | 200170 PFP Operator Certification - Surveillance. |
| Description | This self-study course provides instructions on procedures, specifications, requirements, and bases affecting the performance of the required surveillances performed by the qualified Nuclear Process Operator. |
| Mandating Document(s) | DOE 5480.20A, WHC-CM-5-8. |
| Target Audience | PFP Nuclear Process Operator. |
| Delivery | Manual with Study Guide - a Self-study Course. |
| Evaluation | On-the-job Checklist, Job Performance Measure, Exam, and Exam Ans. |
| Length | Not established. |
| Frequency | 24 Months. |

| | |
|------------------------------|---|
| Title | 200140 PFP Operator Certification - Solid waste. |
| Description | This training course provides documentation of completed training for Solid Waste Operations. |
| Mandating Document(s) | DOE 5480.20A, WHC-IP-1121. |

| | |
|-----------------|--|
| Target Audience | PFP Nuclear Operators and selected Managers. |
| Delivery | On-the-job Training/Checklist. |
| Evaluation | Evaluation/Exam. |
| Length | 40 Hours. |
| Frequency | 24 Months. |

APPENDIX

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|-----------------------|--|
| Title | 200130 PFP Operator Certification - General Plant Operations. |
| Description | This self-study course provides instruction on procedures, specifications, requirements, and bases affecting the routine tasks performed by the PFP General Plant Operators. |
| Mandating Document(s) | DOE 5480.20A, WHC-IP-1121, WHC-CM-5-8, WHC-CM-2-15. |
| Target Audience | PFP Nuclear Operators. |
| Delivery | On-the-job Training/Checklist. |
| Evaluation | Evaluation/Exam, Qualification Card. |
| Length | 40 Hours. |
| Frequency | 24 Months. |

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| | | ECN No. |

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