ATTACHMENT F

FACILITY PERSONNEL PERMIT TRAINING PROGRAM

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ATTACHMENT F

FACILITY PERSONNEL PERMIT TRAINING PROGRAM

F-0 Introduction

This attachment describes the *Facility Personnel Permit Training Program* for the Waste Isolation Pilot Plant (**WIPP**) facility in accordance with the requirements of the Resource Conservation and Recovery Act (**RCRA**) and the New Mexico Hazardous Waste Act as described in 20.4.1.500 New Mexico Administrative Code (**NMAC**) (incorporating Title 40 of the Code of Federal Regulations (**CFR**) §264.16), and 20.4.1.900 NMAC (incorporating 40 CFR §270.14(b)(12)).

The primary objective of the *Facility Personnel Permit Training Program* is to prepare facility personnel to operate and maintain the WIPP facility in a safe and environmentally sound manner in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16). To achieve this objective, the program provides WIPP facility employees with training relevant to their positions.

Waste Isolation Pilot Plant facility employees, including those not directly involved in transuranic (**TRU**) mixed waste handling activities or emergency response, receives an introduction to the RCRA regulations and emergency preparedness in their General Employee Training (**GET**) class. General Employee Training emphasizes that WIPP facility personnel and site visitors are required to comply with directions from emergency personnel and alarm system notifications and to follow instructions concerning emergency equipment, shutdown procedures, signage, and emergency evacuation routes and exits. In this way employees at the WIPP facility are given, at a minimum, a basic understanding of the regulatory requirements and emergency procedures. This ensures that facility employees know how to respond effectively to emergencies through familiarization with emergency procedures, emergency equipment, and emergency systems. Facility employees in TRU mixed waste management or emergency response positions receive additional classroom and on-the-job training designed specifically to teach them how to perform their duties safely and in conformance with regulatory requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264). Transuranic mixed waste management personnel receive the required training before being allowed to work unsupervised, and emergency response personnel receive appropriate training before being called upon to respond to actual emergencies.

The training requirements of the *Facility Personnel Permit Training Program* are implemented via the WIPP Training Program and apply to appropriate facility personnel of the U.S. Department of Energy (**DOE**) and contractors, subcontractors, and bargaining-unit members who;

- Regularly work at the facility that may come in contact with and/or manage TRU mixed waste, or
- Oversee the operations of the facility that may come in contact with and/or manage TRU mixed waste, or
- Supervise individuals who may come in contact with and/or manage TRU mixed waste, or

- Provide emergency response capabilities.

This *Facility Personnel Permit Training Program* describes the introductory and continuing training provided to personnel at the WIPP facility, with emphasis on those facility personnel and their supervisors whose jobs are such that their actions or failure to act could result in a spill or release, or the immediate threat of a spill or release of TRU mixed waste.

This *Facility Personnel Permit Training Program* does not apply to facility employees who manage site-generated hazardous waste, low-level waste, universal waste, or other forms of hazardous waste that are not categorized as TRU mixed waste.

F-1 Outline of the Facility Personnel Permit Training Program

Employee training for the purpose of TRU mixed waste management and emergency response at the WIPP facility is the overall responsibility of the Management and Operating Contractor Project Manager, with responsibility for implementation delegated to Technical Training. Technical Training is managed by the Technical Training Manager. The Technical Training Manager (or designee) has the responsibility for directing the *Facility Personnel Permit Training Program*. The list of job titles in Table F-1 identifies the jobs at the WIPP facility that include responsibilities for TRU mixed waste management and emergency response.

F-1a Facility Personnel Permit Training Program Design

In developing the *WIPP Training Program*, Technical Training has used a modified version of the Systematic Approach to Training (**SAT**) which has five distinct phases to develop training programs. These phases are:

- Analysis
- Design
- Development
- Implementation
- Evaluation

Technical Training utilizes guidance provided within the DOE Handbooks, “Training Program Handbook: A Systematic Approach to Training (DOE-HDBK-1078-94),” and “Alternative Systematic Approaches to Training (DOE-HDBK-1074-95)” to direct these five phases.

Technical Training ensures that Permit-required training is conducted by qualified instructors as indicated in the *WIPP Training Program*.

Cognizant line managers provide significant input on training requirements for WIPP facility personnel to qualified instructors who develop the following, as required:

- Classroom Instruction
- Required reading, structured self-study, eLearning, computer-based training
- On-the-Job Training

Upon completion of the specific classroom, computer-based training, eLearning or structured self-study technical training courses, trainees must successfully complete written (includes in person examinations, computer, and web based training examinations) or oral examinations to demonstrate competency.

Technical training documentation and records are maintained by Technical Training located at the WIPP facility. Documents and records required by 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d)(1), (2), (3), and (4) are maintained in WIPP facility files and include the following:

- Job titles for positions related to TRU mixed waste management and emergency response and names of the employee filling those positions
- Written job descriptions for the applicable positions
- Written description of the type and amount of introductory and continuing training given for each applicable position
- Records documentation that the training or job experience required has been given to or completed by facility personnel include as appropriate:
  - Course Attendance
  - Completed Qualification Cards
  - Off-Site Training Documentation
  - Training or job experience given and completed for each position

Documentation is maintained which includes records of training qualifications, and course attendance. The documentation is used to identify course refresher and requalification dates. Training records on current personnel are kept in the Technical Training files until facility closure. Technical training records on former employees are kept by Technical Training for at least three years from the date of employment termination from the WIPP facility. Training documentation for emergency response training received by personnel called out in the *RCRA Contingency Plan* (Permit Attachment D) is also maintained by Technical Training.

F-1b Job Title/Job Description

Facility personnel who are involved in TRU mixed waste management and emergency response activities receive the same core RCRA training. A list of TRU mixed waste management and emergency response job titles and position descriptions is provided in Table F-1. An up-to-date list of personnel assigned to these positions is maintained in WIPP facility files by the Permittees in accordance with 20.4.1.500 NMAC (incorporating 40 CFR §264.16(d)(1)). The core TRU mixed waste management and emergency response training courses are indicated in Table F-2. Any changes to the Facility Personnel Permit Training Program specified training course materials (contained in WIPP facility files) that affect the Table F-2 training course content will be evaluated to determine if a permit modification is required, as specified in 20.4.1.900 NMAC (incorporating 40 CFR §270.42 The job titles listed in Tables F-1 include:

- Emergency Coordinator
- TRU Mixed Waste Worker
- TRU Mixed Waste Worker Supervisor
- Inspector
- RCRA Training Director
- Emergency Responder

F-1b(1) Training Content

To ensure that facility personnel are knowledgeable in responding effectively to emergency situations, every employee, regardless of whether they hold a position in TRU mixed waste

management or emergency response, receives GET and the annual GET refresher training on topics relevant to the management of TRU mixed waste and emergency response that include:

- Emergency Preparedness and Response
- RCRA (including the Permit and the RCRA Contingency Plan)
- Fire Protection
- Safety Signage

Training course updates are identified by periodically reviewing the Table F-2 Permit-required training courses to ensure the content remains consistent with applicable Federal and State regulations. This review will be performed in accordance with the *WIPP Training Program* and the review will be documented in the WIPP facility files.

To facilitate identification of changes to Table F-2 Permit-required training courses, changes to training course materials, which will be maintained in the WIPP facility files, will have revision numbers and a change history summary. This training course information will be available for NMED inspection upon request.

F-1b(2) Training Frequency

Transuranic mixed waste management and emergency response courses are offered at a frequency that ensures new hires or transfers can receive Permit-specified training within six months of assuming their new position. Annual refresher training is required for each Permit course. Employees do not work unsupervised in TRU mixed waste management positions until they have completed the Permit-required initial training. In cases where an employee's annual refresher training has lapsed, that employee cannot work unsupervised until the initial training has been repeated. The cognizant manager notifies the Human Resources Department who notifies the training staff when any employee is transferred into or out of a position associated with TRU mixed waste management or emergency response.

F-1b(3) Training Techniques

A variety of instructional techniques are used at the WIPP facility depending on the subject matter and the techniques that best suit the learning objectives. Many courses may include a combination of classroom, on-the-job training, computer-based training, eLearning, self-paced study, laboratory work, and/or comprehensive examinations. Most equipment operation courses include hands-on practical instruction.

Written examinations (includes in person examinations, computer, and web based training examinations) are used as a technique to test and document the knowledge level of individuals participating in classroom training courses. The length and content of each exam varies according to its objective. If individuals fail a written examination, in accordance with WIPP training procedures, they are disqualified from working unsupervised for the role or task associated with the failed training until the training course examination has been successfully completed.

On-the-job training at the WIPP facility follows a prescribed set of standards specific to the job to be performed. Typically, to become qualified to operate a piece of equipment or system, employees must be able to demonstrate the location and purpose of specified controls and gauges, describe proper startup and shutdown procedures, describe specific safety features and limitations of the equipment, and, in some cases, perform maintenance functions. They

must also demonstrate the ability to operate the equipment or system. On-the-job training may also be function specific, such as performing a specific administrative function that is regulated. The terms “on-the-job-training,” “on-the-job-evaluation,” and “job performance measures” are considered equivalent with respect to training courses or qualification cards in accordance with DOE-HDBK-1074-95.

In addition to on-the-job training, some positions require the trainee to attend an oral board. The oral board is given upon completion of on-the-job training and prior to operating any equipment unsupervised. In the oral board, the trainee is quizzed on knowledge learned in on-the-job training. The purpose of the oral board is to determine if the trainee fully understands and can apply the knowledge learned in the training process.

Individuals who provide evidence of equivalency for specific requirements or prerequisites identified in the Table F-2 Permit-required training courses may be granted an exception from further training to those requirements in accordance with the *WIPP Training Program*. Requests for exceptions/equivalences are made and evaluated in accordance with the *WIPP Training Program*. Training exceptions/equivalences must be approved by the RCRA Training Director with concurrence of the Environmental Compliance Manager or his/her designee. Each exception/equivalency request is evaluated per specific criteria, such as 1) completion of previous training (transcripts, training completion records), 2) previous experience (résumé) that demonstrates the application of knowledge and/or skills presented by course objectives, and 3) satisfactory completion of an examination having equivalent course objectives. Each exception/equivalency will be granted in writing and documented in the individual’s training record.

F-1c Technical Training Manager (RCRA Training Director)

The Technical Training Manager (or designee) directs the *Facility Personnel Permit Training Program,* implemented via the *WIPP Training Program*, and is responsible for establishing technical training requirements in cooperation with the line managers. Specifically, this includes analysis, design, development, implementation, and evaluation of technical training. The Technical Training Manager (or designee) is trained in hazardous waste management procedures. The Technical Training Manager (or designee) is also required to be knowledgeable of the applicable regulations, orders, guidelines, and the specific training process employed at the WIPP facility.

The name and qualifications of the current Technical Training Manager are documented in WIPP facility files.

F-1d Relevance of Training to Job Position

The *WIPP Training Program* provides employees and their supervisors with training relevant to their positions. The SAT process mentioned in Section F-1a is a systematic method for determining the proper training for each TRU mixed waste management position. It compels managers and training staff to look critically at each position and determine the necessary training program for each employee to perform their work in a manner that protects human health and the environment and complies with the Permit.

Several training topics are considered relevant for all WIPP facility personnel. The basic philosophy at the WIPP facility is that, as a RCRA-regulated facility, facility personnel must understand the basic regulatory requirements under which the WIPP facility must operate as

well as emergency actions required of facility personnel. Therefore, WIPP facility personnel receive an introduction to the RCRA during their GET.

Beyond these universal topics, training is designed and implemented relevant to the specific job functions being performed. For example, employees who operate key pieces of equipment necessary to manage contact-handled (**CH**) or remote-handled (**RH**) TRU mixed waste (e.g., forklifts, hoists, bridge cranes, cask transfer cars) must be trained to perform their duties in a way that ensures the WIPP facility is operated in compliance with the Permit. These employees receive on-the-job training and demonstrate the ability to operate the equipment, as appropriate, and must at a minimum be able to respond effectively to emergencies that might arise while performing their duties. Emergency response personnel receive training, commensurate with their duties, that ensures their familiarity with emergency procedures, emergency equipment, and emergency systems including, but not limited to:

- Procedures for using and inspecting facility emergency equipment:
- Communications and alarm systems; and
- Response to fires or explosions.

As there are no automatic waste feed systems at the WIPP facility, training on parameters for waste feed cut-off systems is not required. Similarly, as there is no potential for groundwater contamination incidents at the WIPP facility, training for responding to such incidents is not required.

F-2 Implementation of Facility Personnel Permit Training Program

The *WIPP Training Program* has been formulated to implement the requirements of this *Facility Personnel Permit Training Program*, thereby ensuring TRU mixed waste management and emergency response personnel employed at the facility receive the training necessary to comply with the requirements of 20.4.1.500 NMAC (incorporating 40 CFR Part 264.16).

Newly hired employees, whose job positions are listed in Table F-2, receive the indicated training within six months of their date of hire or their transfer to a new position pursuant to 20.4.1.500 NMAC (incorporating 40 CFR §264.16(b). Personnel do not work unsupervised in TRU mixed waste management or emergency response positions until they successfully complete the Permit-indicated training requirements. TRU mixed waste management and emergency response personnel attend annual refresher courses that review the initial training received and document knowledge transfer. Per the *WIPP Training Program*, annual Permit refresher training is to be completed within 30 calendar days of an employee's training anniversary date. If an employee's annual refresher training has lapsed, they do not work unsupervised in TRU mixed waste management or emergency response positions until they have successfully repeated the Permit-required initial training.

Records relating to the *Facility Personnel Permit Training Program* for TRU mixed waste management and emergency response personnel are maintained by WIPP Technical Training as personally identifiable information. These records are located at the WIPP facility and include a roster of employees in hazardous waste management positions; a list of courses required for each position; course descriptions; documentation when each employee has received and completed appropriate training. Training records of current personnel are kept by Technical Training until closure of the WIPP facility. Records of former employees are kept by Technical Training for at least three years from the date the employee last worked at the facility.

F-3 References

Salado Isolation Mining Contractors LLC, “WIPP Training Program,” WP 14-TR.01

Salado Isolation Mining Contractors LLC, “WIPP Emergency Services Training Plan,” WP 12-FP.04

U.S. Department of Energy, “Training Program Handbook: A Systematic Approach to Training (DOE-HDBK-1078- 94)”

U.S. Department of Energy, “Alternative Systematic Approaches to Training (DOE-HDBK-1074 95)”

TABLES

Table F-1
TRU Mixed Waste Management and Emergency Response Job Titles and Descriptions

JOB TITLE	POSITION DESCRIPTION
TRU Mixed Waste Worker	Responsible for or involved in the surface processing, transport, and underground emplacement of CH and RH TRU mixed waste. May come into contact with TRU mixed waste while carrying out job duties, actions or failure to act could result in a spill or release of TRU mixed waste at the WIPP facility, and job is important for operating the facility safely and in compliance with the hazardous waste regulations. Depending upon the TRU Mixed Waste Worker's specific job position, this may involve one or more of the following: • Operating waste handling equipment and support systems to unload, handle, and emplace TRU mixed waste into the repository • Performing spot decontamination of shipping casks, waste containers, and waste handling equipment • Performing waste container overpacking operations • Conducting routine inspections of incoming shipping containers for contamination and damage • Conducting routine contamination surveys during waste handling activities • Operating the Waste Shaft Hoist • Loading and unloading of the Waste Shaft Conveyance above and below ground • Managing and dispositioning of waste resulting from releases of TRU mixed waste or TRU mixed waste constituents • Cleaning and restoring emergency response equipment after a release of TRU mixed waste or TRU mixed waste constituents and prior to resumption of normal operations
TRU Mixed Waste Worker Supervisor	Supervisors of TRU Mixed Waste Workers are directly responsible for day-to-day operations related to TRU mixed waste. Depending upon the TRU Mixed Waste Worker Supervisor's specific job position, job duties may involve one or more of the following: • Overseeing TRU mixed waste management activities performed by TRU Mixed Waste Workers • Coordinating and directing the daily operation and maintenance of the Waste Shaft Hoist and Waste Shaft
Emergency Responder	Emergency responders provide expertise and support to the Incident Command. Depending upon the Emergency Responder's specific job position, job duties may involve one or more of the following: • Responding to fires, explosions, or emergencies involving releases of TRU mixed waste or TRU mixed waste constituents • Performing technical rescue operations • Performing emergency medical response • Operating emergency vehicles and equipment • Establishing conditions at the incident scene • Managing incident operations, personnel, and resources • Ensuring that fires, explosions, and releases of TRU mixed waste do not occur, recur, or spread to other hazardous waste at the facility by stopping processes and operations, collecting and containing released TRU mixed waste, and removing or isolating containers, as applicable • Performing decontamination of contaminated personnel and providing oversight to emergency medical response personnel, if injured person is contaminated

JOB TITLE	POSITION DESCRIPTION
	• Conducting contamination surveys, establishing hot lines/cold zones, and performing decontamination following a release of TRU mixed waste or TRU mixed waste constituents • Overpacking or plugging/patching of waste containers associated with release of TRU mixed waste or TRU mixed waste constituents • Performing containerization of released TRU mixed waste or TRU mixed waste constituents • Terminating field emergency response
Emergency Coordinator	In the event of a fire, explosion, release of TRU mixed waste or TRU mixed waste constituents that could threaten human health or the environment, the Emergency Coordinator is responsible for carrying out the implementation of the *RCRA Contingency Plan*. Emergency Coordinators ensure emergency responders have current and specific information to properly address the incident and minimize hazards to human health and the environment. Emergency Coordinators implement measures and procedures to ensure the safety of personnel, such as ensuring that alarms have been activated, personnel have been accounted for, and evacuation of personnel has occurred, if necessary. Upon implementation of the *RCRA Contingency Plan*, depending upon the Emergency Coordinator's specific job position, the job duties may involve one or more of the following: • Providing notification to emergency response personnel • Ensuring that alarms have been activated, personnel have been accounted for, any injuries have been attended to, and evacuation of personnel has occurred, if necessary • Restricting personnel not needed for response activities from the scene of the incident and curtailing nonessential activities in the area • Identifying released material and assessing the extent of the emergency • Assessing any hazards to human health or the environment associated with a fire, explosion, or release of TRU mixed waste or TRU mixed waste constituents • Notifying appropriate State and local agencies with designated response roles if their help is needed • Ensuring that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility by taking measures such as stopping processes and operations, collecting and containing released waste, and removing or isolating containers • Documenting the implementation of the *RCRA Contingency Plan* • Ensuring immediate notification to the New Mexico Environment Department is provided for incidents requiring implementation of the *RCRA Contingency Plan* • Making post-assessment notifications if it has been determined that the incident could threaten human health or the environment outside the facility • Providing for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility • Ensuring that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed • Ensuring that emergency equipment listed in the *RCRA Contingency Plan* is cleaned and fit for its intended use before operations are resumed

JOB TITLE	POSITION DESCRIPTION
Inspector	Responsible for routine inspection and maintenance (including repairing and replacement, as appropriate) of equipment instrumental in preventing, detecting, or responding to environmental or human health hazards, such as monitoring equipment, safety and emergency equipment, and operating or structural equipment. Inspections are performed at the facility to detect malfunctions, deterioration, operator errors, and discharges that may cause or lead to releases of TRU mixed waste or TRU mixed waste constituents to the environment or that could be a threat to human health. Depending on the Inspector's specific job position, job duties may involve one or more of the following: • Performing functional and operational checks of waste handling equipment and support systems as well as conducting waste container storage inspections • Conducting routine inspections of emergency response equipment and vehicles, on site • Performing routine inspections of the hoisting equipment for the Air Intake Shaft, Salt Handling Shaft, Shaft #5 (Utility Shaft), and Waste Shaft • Conducting routine inspections and testing of facility fire suppression and detection systems • Inspecting and testing of communication systems, site notification system, the public address system, and alarm systems for proper function • Performing routine inspections of the backup power supply diesel generators • Performing routine inspections of the eye wash and shower equipment • Performing routine inspections of the underground geomechanical instrumentation system • Performing routine inspections of the central uninterruptible power supply • Performing routine inspections of the fire water storage tank • Performing routine inspections of the ventilation exhaust fans
RCRA Training Director	Responsible for directing the hazardous waste management training at the WIPP facility. To meet the 20.4.1.500 NMAC (incorporating 40 CFR §264.16(a)(2)) requirements, the RCRA Training Director must be a person trained in hazardous waste management procedures.

Table F-2
Permit-Required Training Courses

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
General Employee Training – WIPP facility employees must be escorted at the WIPP facility until this course has been completed. Course content contains information on RCRA, the Permit, the WIPP *RCRA Contingency Plan*, emergency preparedness, emergency response and evacuation procedures, fire protection, and safety signage. There is an annual refresher required for this course.	X	X	X	X	X	X
RCRA Regulations/Hazardous Waste Facility Permit Overview – This course includes an overview of 40 CFR Parts 260-282; *New Mexico Hazardous Waste Act* (Title 20 of the NMAC, Part 4.1); protocol for facility and waste handling equipment inspections; overview of communication systems; overview of security systems; overview of *RCRA Contingency Plan*; overview of WIPP emergency equipment use, inspection, and repair; overview of training requirements; overview of Permit recordkeeping requirements; overview of NMED facility inspections; and consequences of Permit noncompliance. This course also provides an overview of the screening process (for procedures, facility configuration changes, training program changes, etc.) to ensure compliance with the Permit, along with an overview of the Permit modification process. There is an annual refresher required for this course.	X	X	X	X	X	X

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
Hazardous Waste Worker – This course addresses regulatory requirements for personnel who manage hazardous waste, including an in-depth review of the Hazard Communication Standard, principles of toxicology, hazard identification, and an overview of personal protective equipment for work activities associated with TRU mixed waste management. It also prepares emergency response personnel for hazardous waste handling, containment, and decontamination. There is an annual refresher required for this course.	X	X		X		X
Hazardous Waste Responder – Employees must complete Hazardous Waste Worker training before taking this course. Upon successful completion of the course and its prerequisites, a trainee will be able to respond to emergencies involving TRU mixed waste. Course curriculum includes an overview of the regulatory requirements, incident evaluation, overview of response operations, maintaining safety during an emergency response, and an overview of the Incident Command System at the WIPP facility. There is an annual refresher required for this course.				X		
Hazardous Waste Worker Supervisor – This course addresses manager and/or supervisor responsibilities for TRU mixed waste management. It addresses individual and corporate liability under applicable hazardous waste regulations. Course discusses impacts that decisions made during emergency situations may have, some with serious legal and safety consequences directly impacting the entities involved. There is an annual refresher required for this course.		X				

Course	TRU Mixed Waste Worker	TRU Mixed Waste Worker Supervisor	Inspector	Emergency Responder	Emergency Coordinator	RCRA Training Director
Permit Inspections/Recordkeeping – These technical work documents are under the purview of the responsible organization identified in Table E-1 of Permit Attachment E, *Inspection Schedule, Process and Forms*. This course addresses protocols for conducting Permit-specified inspections to detect malfunctions, deterioration, operator errors, and discharges; completion of inspection records; Permit-specified inspection frequencies; and corrective actions, including notifications and establishment of compensatory measures. This course also addresses review of the completed inspection record for completeness and accuracy; and the Permit-specified recordkeeping requirements. There is an annual refresher required for this course.			X			
RCRA Contingency Plan – This course provides an in-depth review of the WIPP *RCRA Contingency Plan* addressing when the Plan is to be implemented, appropriate emergency response actions, required notifications, evacuation plan details, and post-emergency RCRA-required activities. This course also addresses where copies of the Plan are required to be located and when the Plan must be amended. There is an annual refresher required for this course.					X	