

# SECTION 10 PERSONNEL

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## 10.0 PERSONNEL

Provide the following information concerning personnel qualifications:  
[30 TAC §336.706(a)(2)]:

### 10.1 Organization

the organizational structure of the applicant, both offsite and onsite, including a description of lines of authority and assignments of responsibilities, whether in the form of administrative directives, contract provisions, or otherwise;

This section describes the WCS management functions, authorities, and responsibilities that are assigned to deliver an effective organization. This section provides the organizations responsible for managing the site characterization, design, construction, operation, and decommissioning of the facility. The key management positions and functions are described, including the personnel qualifications for each key position at the facility. This section also describes the WCS training Plan for the facility, which is provided in Appendix 10.4, and the projected staff necessary to operate the facility which is provided in Appendix 10.5.

The following sections provide the WCS organizational structure for the off-site and on-site activities.

#### ***10.1.1 WCS Corporate Functions, Authorities and Responsibilities***

WCS will be the owner and operator of the Low-Level Radioactive Waste Disposal Facility. WCS is a registered Delaware limited liability corporation established to provide waste management services including low-level radioactive waste disposal services. WCS is responsible for the site characterization, design, quality assurance, construction, operation, and closure of the Low-Level Radioactive Waste Disposal Facility.

The President and Chief Financial Officer (President) is the executive in charge of WCS operations. Reporting to the President are the Sr. Vice President of Licensing and Regulatory Affairs, Sr. Vice President of Business Development, Vice President and General Manager, Vice President of Community Relations, Director of Quality Assurance, Director of Finance and Accounting and the Director of Planning and Analysis. The Corporate Radiation Safety Officer is the chairman of the facility Radiation Safety Committee and in this capacity has direct access to the President.

Figure 10-1 outlines the reporting relationship and the lines of authority for the corporate organization.

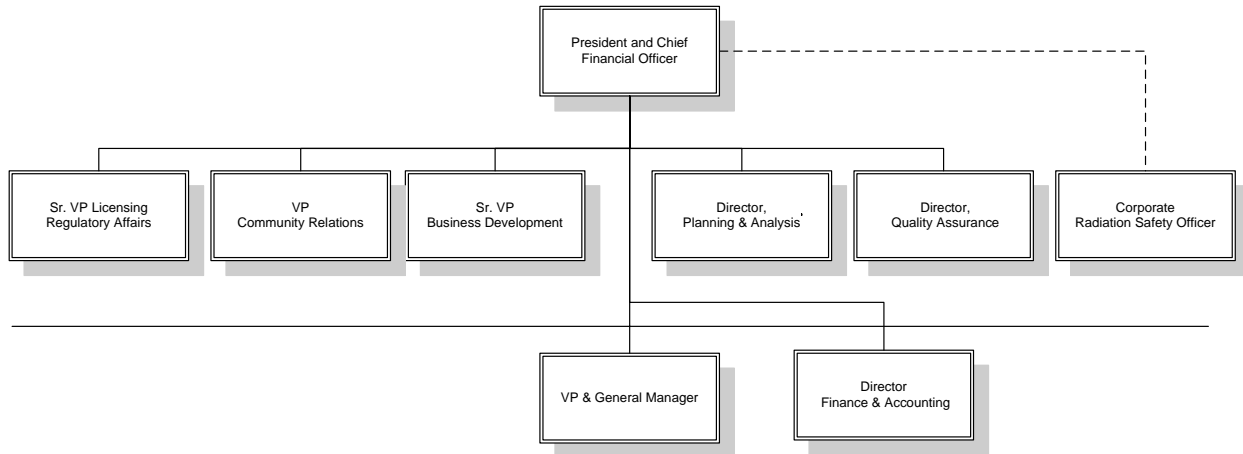


Figure 10-1. WCS Corporate Organization

### 10.1.2 WCS Site Functions, Authorities, and Responsibilities

During the licensing preparation phase, WCS has contracted with URS Corporation to prepare the reference design for the facility and support WCS in the development of this application. Cook-Joyce Inc. has been contracted to perform the site characterization studies. WCS maintains full responsibility for the site characterization, design, quality assurance, construction, operation, and closure of the facility.

**Site Characterization and Design** – WCS is responsible for managing the site characterization and design activities. The WCS site characterization lead contractor, Cook-Joyce, is responsible for working to the WCS QA Program and procedures for collecting site characterization data that will be used and qualified to support the design of the facility. Cook-Joyce Inc. is also responsible for working to the WCS procedure for qualification of existing data collected to support the site characterization.

Management of the facility design which is lead by URS Corporation is accomplished by using a qualified design organization. WCS requires that the design contractor have a QA Program that meets the WCS QA Program requirements. During the licensing phase, WCS evaluated the design contractor's QA Program and determined that it was acceptable, meeting the WCS requirements.

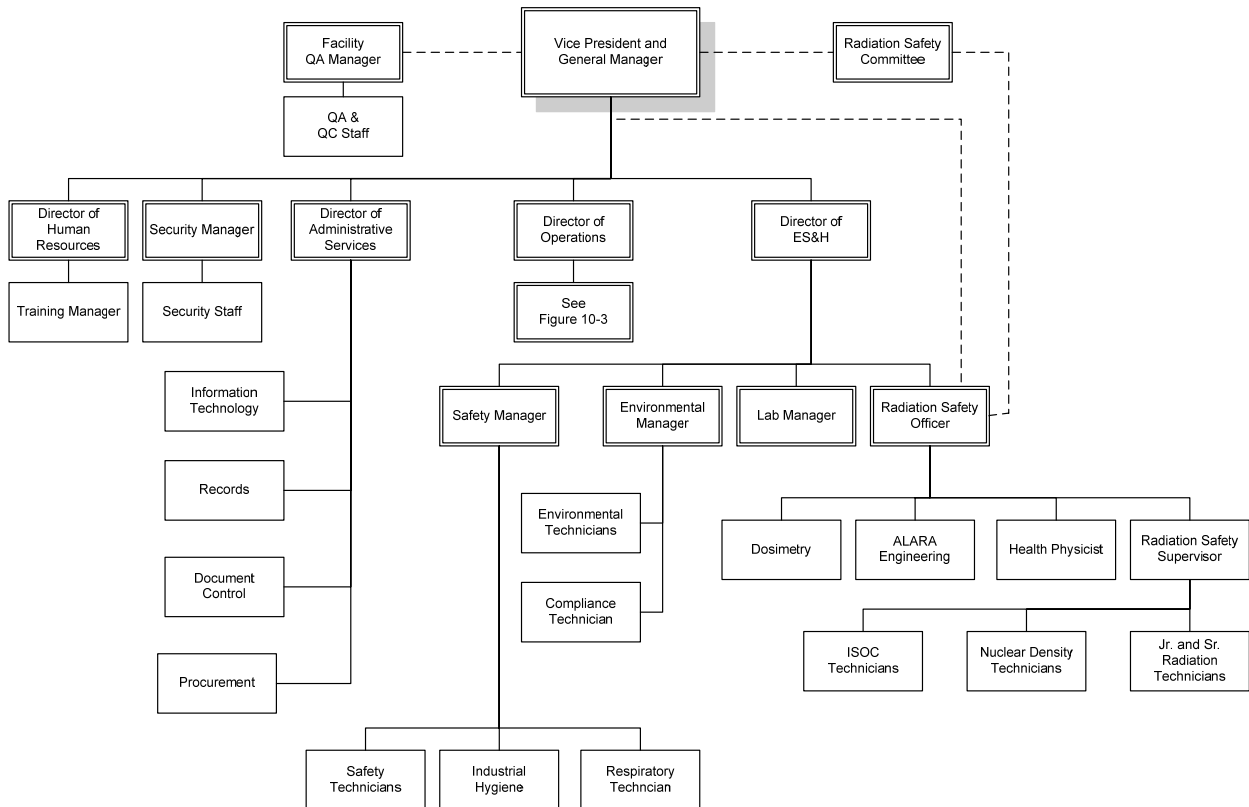
**Construction** – WCS is responsible for the construction of the facility. A qualified construction contractor will be selected to construct the facility in accordance with approved design documents. The contracted construction Project Manager will report to the Director of Operations.

**Operations** – The WCS Vice President and General Manager is responsible for the overall construction, operation, and administration of the low-level radioactive waste facility. This position is also responsible for ensuring the facility complies with all applicable requirements and is operated in a safe manner. In the discharge of these responsibilities, the Vice President and General Manager directs the following functional areas:

- Construction
- Operations
- ES&H
- Security
- Facility QA
- Administrative Services
- Human Resources

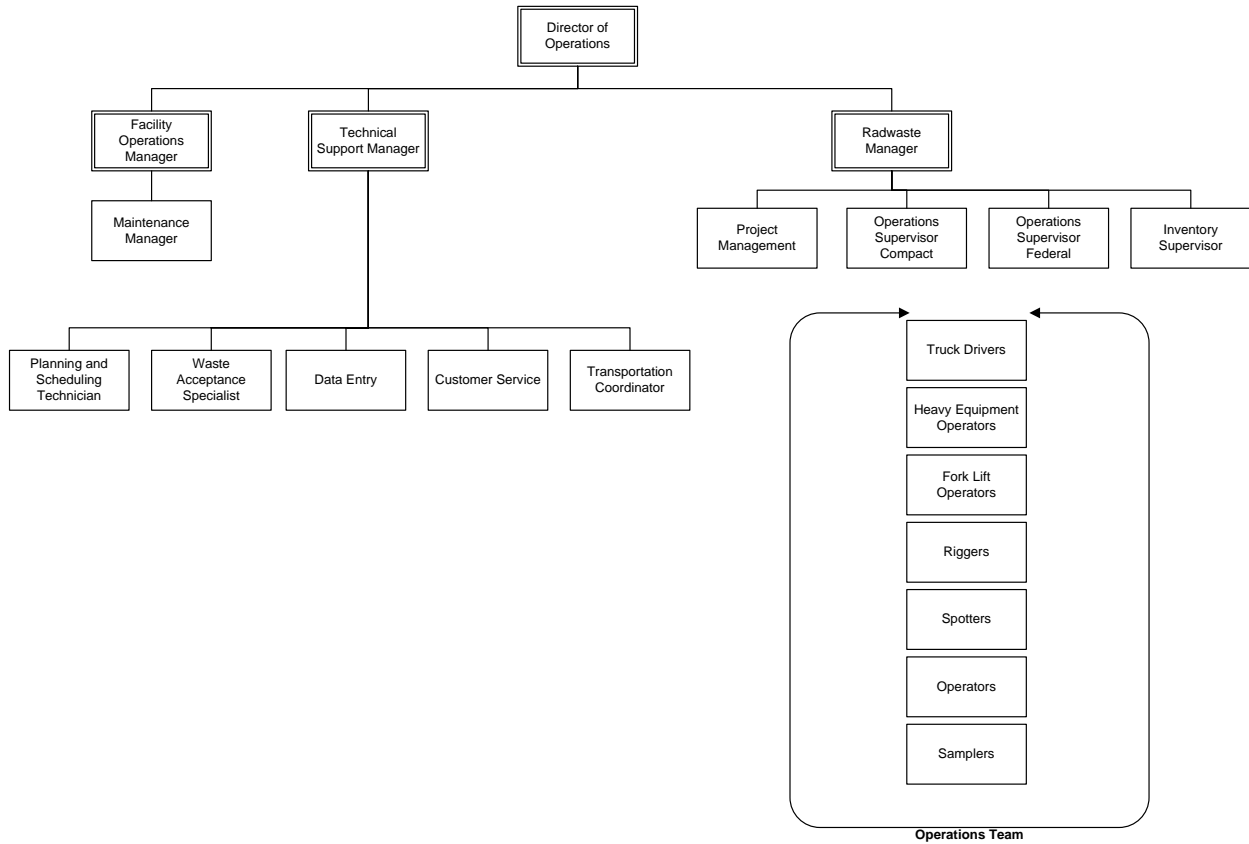
Although the Facility QA function reports to the Director of Quality Assurance, the Facility QA Manager receives functional direction from the Director of Quality Assurance and administrative direction from the Vice President and General Manager.

The lines of authority for management positions supporting operations activities are shown in Figure 10-2 and Figure 10-3 for the WCS key operating positions at the facility reporting to the Vice President and General Manager.



**Figure 10-2. WCS Facility Organization**

**APPLICATION FOR LICENSE TO AUTHORIZE NEAR-SURFACE  
LAND DISPOSAL OF LOW-LEVEL RADIOACTIVE WASTE  
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**Figure 10-3. WCS Operations**

## 10.2 Technical Qualifications of Applicant and Staff

**The technical qualifications, including training and experience, of the applicant and members of the applicant's staff to engage in the proposed activities. Minimum training and experience requirements for personnel filling key positions described in Subsection 13.1 [sic – probably should be 10.3] of this section shall be provided;**

WCS operates a state-of-the-art facility located in Andrews County, Texas. This facility is unmatched in the United States in its extensive authorizations and permits, which include the ability for treatment, storage, and landfill disposal of hazardous and toxic waste, as well as treatment and storage of low-level and mixed low-level wastes at its 1,338-acre site near the Texas-New Mexico border. An approximately 13,500-acre tract owned by WCS surrounds the permitted site. WCS planned, designed, and built its facility to comply with all applicable Texas and Federal regulations. The Subtitle C landfill currently has 5.423 million cubic yards of permitted disposal capacity.

Other WCS site facilities include a negative pressure Mixed Waste Treatment Building dedicated to the treatment of radioactive and mixed waste. This processing facility includes over 20,000 ft<sup>2</sup> of treatment and staging area and an 85-yd<sup>3</sup> capacity mixing pan. A stabilization building has two additional 85-yd<sup>3</sup> mix pans for hazardous waste only. Covered storage is available in the Container Storage Area (CSA) with 36,760 ft<sup>3</sup> (275,000 gallons) of waste storage capacity and

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Bin Storage Area (BSA) 1 with 1,080 yd<sup>3</sup> of storage capacity (liquid or solid). Uncovered storage is available in the CSA (1,360 yd<sup>3</sup> each) as well as Bin Storage Unit 2, which is available with storage capacity for 3,240 yd<sup>3</sup> of solids only. The LSA storage area 1.5 million ft<sup>3</sup> is available of storage of low specific activity dry solid radioactive waste in canisters.

The WCS holds a Resource Conservation Recovery Act (RCRA) Part B permit to receive ignitable, corrosive, toxic, (selected) reactive, and non-hazardous wastes. Liquids, sludges, solids, lab packs in approved canisters, and liquids in bulk tankers, are also accepted. It is licensed to receive radioactive waste in any form (solid or liquid). The site is also permitted to receive Polychlorinated Biphenyl (PCB) and PCB-contaminated wastes including PCB-contaminated debris, spill solids, transformer (drained and flushed) carcasses and other PCB-contaminated materials. PCB liquids are acceptable for bulking and off-site treatment. The site is also approved under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), granted March 27, 1997.

WCS has been operating the Andrews County facility since 1996 and has continuously implemented progressive organizational and operational performance improvement changes to ensure compliance with licensing requirements and WCS goals for operational excellence. Over the past ten years, lessons learned from operating experience have resulted in process/procedure changes and in some cases organizational changes.

Since February 2006, WCS has implemented several key organizational changes. Some of these changes were a result of the natural attrition process and some changes resulted as a result of the WCS President's initiatives to move WCS into a more rigorous safety and compliance culture. The WCS organizational change goals included a commitment to ensuring that WCS operated their facilities in compliance with the regulatory commitments and ensuring that the health and safety of the employees and the public and the environment are not adversely impacted by WCS operations.

In February 2006, Rodney Baltzer was named as the new WCS President. Rod was a member of the WCS executive team and has been with WCS since 1998. Rod quickly initiated needed management changes to address outstanding non-compliant operational issues.

A major change instituted by Mr. Baltzer was the search and selection of a new Vice President and General Manager. This action required a nationwide search for the best-qualified candidate. WCS selection criteria included: an individual with direct management experience in nuclear waste management and an individual with a proven track record of success managing facilities that were in need of operational and compliance changes.

In September 2006, Linda Beach, PE, joined the WCS team as the new Vice President and General Manager. Ms. Beach has more than 25 years experience in the nuclear industry, consisting of operations under DOE, NRC, and NRC-agreement state regulations. She also has extensive experience in nuclear materials processing, nuclear waste management, ES&H, and facility operations management. Linda is an industry leader at leading turnarounds at troubled nuclear waste processing facilities, revamping waste disposal operations and leading organizations through difficult transitions and culture changes.

In November 2006, the WCS Vice President and General Manager implemented organizational changes in the Operations organization by naming a new Director of Operations with an

extensive radiation safety background. Subsequent management changes included demotion of a supervisor back to an operator for failure to promptly address safety issues under his purview. Both of these changes were a result of the Vice President and General Manager's initiatives to improve the safety and compliance culture at the WCS facilities.

In July 2006, the WCS President secured the services of Washington Safety Management Solutions (WSMS) to provide management and integration support to WCS. WSMS support also includes mentoring and augmented staff to assist in improving the WCS safety culture at the facility. Conduct of Operations (CONOPS) training was provided to site employees as the first step of the improvement the safety culture. WSMS has extensive experience at operating nuclear facilities and has provided WCS access to a highly qualified pool of experienced operating personnel.

Key positions that support the operations functions of the facility are included in Section 10.3, "Key Positions."

### **10.3 Key Positions**

#### **Description of minimum training and experience requirements of personnel filling on-site management and key operations positions;**

This section describes the functional positions responsible for managing the operation of the facility. The facility is staffed at sufficient levels prior to operation to allow for training, procedure development, and other preoperational activities.

WCS managers have the authority to delegate tasks to other individuals; however, the responsible manager retains the ultimate responsibility and accountability for implementing the applicable requirements.

The following sections provide the key management and operating level positions for the facility. These sections provide the authorities, responsibilities, and reporting relationships. The technical qualifications, including the minimum experience and education requirements, are also defined.

#### ***10.3.1 Vice President and General Manager***

The Vice President and General Manager (GM) reports to the WCS President. This position is responsible for ensuring the facility complies with all applicable regulatory requirements and is operated in a safe, reliable, and efficient manner. This position is responsible for selection of personnel for the key facility positions. The GM is responsible for the protection of the facility personnel and the general public from radiation and chemical exposure and/or any other consequences of an accident at the facility. This position is responsible for compliance with the facility license. The GM or designee(s) have the authority to approve and issue WCS facility procedures.

The GM shall be knowledgeable of the waste management processes, chemical safety, industrial safety, and radiation protection program concepts as they apply to the overall safety of the facility. The GM will conduct an assessment to ensure that the facility has a sufficient number of trained and qualified personnel prior to receipt of waste under the License. The Radiation Safety

Committee reports directly to the GM, and the GM maintains direct lines of communication with Radiation Safety Officers.

The GM shall have a Bachelor's Degree (or equivalent) in an engineering or scientific field and ten years of responsible waste management experience.

### **10.3.2 Director of Operations**

The Director of Operations reports to the Vice President and General Manager and has the responsibility for managing engineering, construction, and operations of the facility. This position also has responsibility for process planning, scheduling, waste tracking, waste storage, waste treatment, waste shipments, and radwaste operations.

The Director of Operations shall have a Bachelor's Degree in an engineering or scientific field (or equivalent) and ten years of related experience.

### **10.3.3 Director of Environmental, Safety and Health**

The Director of ES&H reports to the Vice President and General Manager and has the responsibility for the health, industrial safety, radiological safety, and environmental compliance programs. This position is also responsible for ensuring environmental monitoring and compliance, regulatory commitment tracking, and interfacing with regulators.

The Director of ES&H shall have a Bachelor's Degree in an engineering or scientific field (or equivalent) and ten years of related experience.

### **10.3.4 Radiation Safety Officer**

The Radiation Safety Officer (RSO) reports to the Director of Environmental Safety and Health. The RSO has responsibility implementing the radiation protection program and coordinates ALARA efforts. This includes training of personnel in use of equipment, control of radiation exposure for personnel, and conducting radiological monitoring. Dosimetry, ALARA Engineering, Health Physics and the Radiation Safety Supervisors report to the RSO.

The RSO shall have, as a minimum, a Bachelor's Degree in an Engineering or Scientific field (or equivalent, preferably health physics) and ten years of related health physics experience. Current CHP certification may be considered equivalent to formal training in health physics.

### **10.3.5 Radwaste Manager**

The Radwaste Manager reports to the Director of Operations and has the responsibility for managing the day-to-day operational activities of the Federal and Compact facilities.

The Radwaste Manager shall have a Bachelor's Degree or equivalent in an engineering or science and 10 years of related experience.

### **10.3.6 Radiation Safety Committee**

The Radiation Safety Committee (RSC), consists of management and safety representatives who are responsible for general review and oversight of facility and operational changes, policies,

procedures, and practices, compliance with applicable requirements, program performance, and a review of incidents and violations of regulations or license conditions. The RSC reports to the Vice President and General Manager.

### **10.3.7 Director of Quality Assurance**

The WCS Director of QA reports to the President. This position is responsible for managing the WCS QA Program. The Director of QA shall be knowledgeable of regulatory requirements and experienced at managing QA activities such as audits and QA technical support.

The Director of QA shall have, as a minimum, a Bachelor's Degree (or equivalent) and 10 years of related quality assurance experience.

### **10.3.8 Facility Quality Assurance Manager**

The WCS Facility QA Manager reports to the Director of Quality Assurance. This position is responsible for managing the QA Program at the facility including audits, QA Technical Support and QC. The Facility QA Manager shall be knowledgeable of regulatory requirements and have experience in oversight of QA work.

The Facility QA Manager shall have a Bachelor's Degree and 5 years of related quality assurance experience.

### **10.3.9 Waste Acceptance Specialist**

The Waste Acceptance Specialist reports to the Technical Support Manager. This position coordinates the waste acceptance process. The Waste Acceptance Specialist shall have a bachelor's degree in an engineering or environmental field or 5 years of related waste management work experience.

### **10.3.10 Radiation Technician**

The Senior Radiation Technicians report to the Radiation Safety Supervisor. These positions conduct surveys of the surface and landfill operations and support activities at the counting lab. The Senior Radiation Technicians shall have an associate degree or 2 or more years of study in the physical sciences, engineering, or a health-related field; at least a total of 4 weeks of generalized training (up to 2 weeks may be on-the-job training) in radiation health

### **10.3.11 Operations Supervisor**

The Operations Supervisors report to the Radwaste Manager. This position manages the daily work activities of the Operators. The Operations Supervisor shall have a high school diploma or GED plus 3 years of operations experience.

### **10.3.12 Operators**

The Operators report to the Operations Supervisor. The Operators are responsible for operating equipment used to handle the waste. The Operators shall have a high school diploma or GED.

**10.3.13 Training Manager**

The Training Manager reports to the Director of Human Resources. This position manages the coordination of WCS training and the implementation of the WSC Training Plan. The Training Manager shall have a Bachelors Degree in Education or Science or a minimum of 10 years of professional training and/or experience may be substituted for academic qualifications.

**10.3.14 Safety and Health Manager**

The Safety and Health Manager report to the Director of Environmental Safety and Health. The Safety and Health Manager is responsible for direct management of the safety and health program and procedure implementation, including oversight on a daily frequency of WCS work activities and OSHA recordkeeping. The Safety and Health Manager is responsible for ensuring that the safety and health training is provided to WCS employees and contractors working at the WCS site. The Safety and Health Manager shall have a Bachelors Degree in Industrial or Occupational Safety or Radiation Safety or a minimum of 60 hours of related college level study and a minimum of 4 years of experience in the field of industrial/occupational safety.

**10.3.15 Facility Operations Manager**

The Facilities Operations Manager reports to the Director of Operations. The Facilities Operations Manager is responsible for maintaining an operating fleet of equipment for facility operations. This includes trucks, forklifts, bulldozers and cranes as a minimum. The Facilities Operations Manager shall have an Associates Degree in Engineering or Construction Technology or 60 hours of related study and 6 years of experience in operations and/or maintenance activities.

**10.3.16 Technical Support Manager**

The Technical Support Manager reports to the Director of Operations. The Technical Support Manager is responsible for managing the facility planning and scheduling, the coordination of transportation of incoming and outgoing waste shipments, customer service, waste acceptance and data entry. The Technical Support Manager shall have a Bachelor's Degree in an Engineering or Science (or equivalent) and 5 years of experience in the environmental industry or a related field.

**10.3.17 Security Manager**

The Security Manager reports to the Vice President and General Manager. The Security Manager is responsible for managing the security staff and implementation of the facility security plans. The Security Manager shall have a Bachelor's Degree in a related field or equivalent and 2 years experience in security or law enforcement and a Texas State Security Certification.

**10.3.18 Director of Administrative Services**

The Director of Administrative Services reports to the Vice President and General Manager. The Director of Administrative Services is responsible for managing procurement, records management, document control, and information technology activities. The Director of

Administrative Services shall have a Bachelors Degree in Business Administration or Engineering or Science (or equivalent) and 5 years of related work experience.

**10.3.19 Radiation Safety Supervisor**

The Radiation Safety Supervisors report to the RSO. The Radiation Safety Supervisor (RSS) supervises and performs complex radiation protection and monitoring work relating to the operations of the Facility. The RSS shall have an Associate Degree in Health Physics/Radiation Safety Technology, physical science, or sixty (60) hours of related study and three-(3) years experience in the field of health physics.

**10.3.20 Projected Staffing Requirements**

Appendix 10.5, “WCS Staffing and Retention Plan,” provides the organizational and staffing levels necessary to operate the facility in a safe and compliant manner.

**10.3.21 Education and Experience Equivalency**

The WCS Director of Human Resources, in consultation with the hiring manager, will evaluate and document if the candidate satisfies the specific position education and work experience requirements. If equivalency for education requirements is considered and approved by both the Director of Human Resources and WCS Management, the evaluation resulting in acceptance of educational equivalency will be documented in the human resources files. The following criteria provided in Table 10-1 and Table 10-2 are typical of the equivalency requirements that will be used. Particular equivalency tables will depend on the position for which the candidate is being considered.

**Table 10-1. Education Requirements**

Degree Required	Equivalency
BS Degree in Engineering or Science	<ul style="list-style-type: none"> <li>• 7 years of documented, related technical work experience can be substituted for a degree or</li> <li>• 5 years of documented, related technical experience and an associated degree in a technical discipline</li> </ul>

**Table 10-2. Technical Work Experience**

Work Experience	Equivalency
For each year of technical work experience	One year of college or university education can be substituted for each year of required related technical work experience.

## 10.4 Training Program

a description of the applicant's personnel training program; and

The WCS Training Plan is provided as Appendix 10.4.

## 10.5 WCS Staffing and Retention Plan

the plan to maintain an adequate complement of trained personnel to carry out waste receipt, handling, and disposal operations in a safe manner. Those plans should include provisions for operating the facility in the event of unavailability of any contracted services or equipment.

The WCS Staffing and Retention Plan is provided as Appendix 10.5.