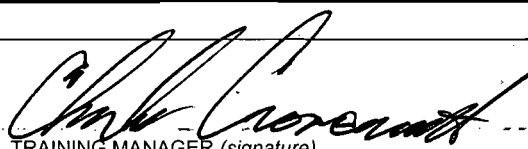



APPENDIX 10.4 WCS TRAINING PLAN

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WCS TRAINING PLAN

APPROVALS:		
<i>Chuck Crowenworth</i> TRAINING MANAGER (<i>printed name</i>)	 TRAINING MANAGER (<i>signature</i>)	<i>3/1/07</i> DATE
<i>Linda J. Beach</i> VICE PRESIDENT & GENERAL MANAGER (<i>printed name</i>)	 VICE PRESIDENT & GENERAL MANAGER (<i>signature</i>)	<i>3/1/07</i> DATE

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1.0 PURPOSE AND SCOPE

- To describe the systems in-place for personnel qualification and training.
- This procedure applies to all Waste Control Specialists (WCS) personnel.

2.0 DEFINITIONS

- "Performance Demonstration" means the showing by actual use of equipment or procedures.
- "Hands-on or On-the-Job training" means training in a simulated work environment that permits each student to have experience performing tasks, making decisions, or using equipment appropriate to the job assignment for which the training is being conducted.
- "Initial training" means training required prior to beginning work.
- "Classroom" means an interactive discourse with a class lead by an instructor.
- "Subject Matter Experts" means possessing the skills, knowledge, experience, and judgment to perform assigned tasks or activities satisfactorily as determined by the employer.

3.0 RESPONSIBILITIES

Department Managers are responsible for providing the following items to the Training Department:

- Department position descriptions and all "Change-in-Status" changes
Personnel/position skill requirements
- Specific department training programs
- Information needed for maintaining our Electronic Training Database and training records system
- Each Manager is responsible for his/her employee training requirements within their department

4.0 PREREQUISITES, PRECAUTIONS AND LIMITATIONS

None

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5.0 INSTRUCTIONS

5.1 TRAINING PHILOSOPHY

The training philosophy for WCS waste facilities is to ensure that personnel associated with the facilities are trained and qualified to perform their respective jobs as described in their overall job assignment. All WCS employees receive training specified for their job assignment before beginning work, and additionally, receive task specific training for certain identified specific tasks.

Personnel associated with WCS waste facilities shall be trained as applicable based on identified regulatory requirements, facility procedures, plans, and identified tasks. The training and qualification program utilizes a systematic approach to training while adhering to a graded approach philosophy. WCS is committed to conducting work efficiently and in a manner that ensures protection of workers, the public, and the environment and is consistent with WCS policies and procedures.

WCS goal is an operating environment that will establish a high level of performance. This performance is accomplished by establishment of high operating standards by management, by communicating standards throughout the organization, by providing sufficient resources, by ensuring personnel are well trained, by closely monitoring performance, and by holding workers and their supervisors accountable for their performance in conducting activities. By combining all these goals WCS enables our employees to recognize that environment, safety, and productivity are compatible goals. WCS believes that these “Conduct of Operations” principles are essential to our employees and our business.

The following core functions and guiding principles reflect the facility training philosophy to satisfy applicable regulatory, environmental health and safety and quality requirements. The following core functions and guiding principles apply.

CORE FUNCTIONS	GUIDING PRINCIPLES
Determining if training is needed	Training is provided when there is unfamiliarity with work processes, equipment, or risk of incorrect execution. Training may be repeated following an accident or near miss event.
Identifying training needs	Line management is responsible for identifying work scope and associated training requirements for each employee position. Training may occur in response to new procedures, equipment or systems.
Identifying goals and objectives	Competence commensurate with responsibilities - personnel possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.
Developing learning activities	Learning activities are based on the objectives, and the activities should simulate the job situation as appropriate. Determine if a group training session, self-paced or on-the-job training is appropriate. Identify training aids.
Conducting the training	The WCS Training Department is responsible for providing required training. Line management is responsible for ensuring training requirements are met for each employee.

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Evaluating program effectiveness	Worker feedback, supervisor feedback and workplace improvements may lead to training modifications that increase correct implementation and reduce error and injury rates.
Improving the program	If the training did not give the employees the level of knowledge and skill that was expected, it may be necessary to revise the program or provide additional training.

The Training Program applies to all WCS staff. Training Program development is accomplished by the WCS Training Manager with implementation assistance from Subject Matter Experts (SMEs), Department Managers, Group/Section Leaders, Supervisors, and outside contractors.

5.2 BACKGROUND

The WCS Training Manager coordinates the WCS Training Plan, which provides employees with the training necessary for the safe and productive completion of their work responsibilities. A primary emphasis is placed on the fulfillment of Radiation Safety, Environmental, Health and Safety (EH&S) and Quality Assurance training requirements.

SMEs provide training from various disciplines. SMEs may be internal, or contracted instructors. The WCS Training Manager will maintain rosters of SMEs approved as trainers for each course. The SMEs, in conjunction with the WCS Training Manager, prepare lesson plans to address identified needs. A trainer may not meet their own training requirements by serving as their own instructor.

Course evaluations using our "Training Evaluation Form" can be obtained from the Training Department to continually improve the training program. Furthermore, the program utilizes the WCS Training Records Database to track employee training participation in relation to mandatory job requirements. Proper management of the Training Records Database aids WCS managers in maintaining employee qualifications current with job requirements.

The information in the Training Records Database is also shared with employees and supervisors to allow for development of individualized employee training curriculum.

5.3 PROGRAM INFORMATION

5.3.1 Training Action Plans

The Training Records Database is programmed with training requirements specific to job title and work location, and generates the appropriate list of requirements. For example, there are different database outputs for Operator I and Operator II, and different facility-specific training among the WCS departments. One example of this is presented in Section 5.6

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5.3.2 Needs Assessment Program

The Needs Assessment Program is a joint effort between the Training Department and Line Management for identifying training needs. The Needs Assessment Program provides a mechanism to identify hazards, training needs, and job task elements. Prior to a new hire starting work, the Human Resources Department informs the Training Department. The new hire's job title and work area are entered into the Training Records Database to generate a list of individual training requirements. The completion of the training needs assessment ensures that mandatory requirements are met, as well as professional development needs. The results are also made available to the employees. The information collected during the needs assessment process aids management in planning for training classes. To assure that training needs are continuously addressed, the WCS Training Manager provides training requirement reports to WCS line management.

Training needs are provided to WCS Managers and Supervisors for use and discussion during the employees' performance evaluation. Any cross training plans are established and planned. In addition, managers are instructed to obtain new training needs for an employee should their assigned job activities change significantly or should they change job positions.

A "Change of Status Form", which can be obtained from the Human Resource Department, is used when a worker changes job titles or work area to ensure that the correct course requirements are reflected for the individual in the Training Records Database.

5.3.3 Training Course Development

Classroom training courses shall be presented by SMEs utilizing formal training lesson plans. These training lesson plans shall be developed in accordance with the process for training course development. This process directs the development of the training, including the delineation of the requirement(s) for the training, the preparation of the lesson plan, and review of the training material. The training review will be conducted by individuals with the appropriate technical background and will identify course deficiencies before general release to their intended audience. This includes development assistance and review by the radiation protection staff, coordinated by the Radiation Safety Officer for tasks involving radiation and/or radioactive materials.

Once a course has been reviewed and approved, it is identified to correspond with particular job titles or work locations. Institutional courses have various formats that include classroom instruction, video, examination, On-the-Job-Training (OJT), Computer Based Training (CBT) and Job Performance Measures

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(JPM). Training courses are continually reviewed by incorporating feedback from trainees, updated regulations, and reviews of other agencies training materials. A “Lesson Plan” form, which can be obtained from the Training Department, may be used to develop a lesson plan.

5.3.4 Testing and Verification of Training

Verification of training shall be either from a written test or from a CBT course test. Test questions may be in the form of true/false, multiple choice, fill in the blank, all that apply and/or performance demonstration. A minimum score of 80% is required for verification of effective training on all written and CBT tests. For staff who pass a written test, test scores and all questions missed on the test will be reviewed with the employee. In the event that a minimum score of 80% on a written test is not achieved, the test will be reviewed with the employee to determine whether classroom training, on-the-job training or both is required to bring the employee's job knowledge up to the acceptance level. Retraining will be initiated as required. The employee is not qualified to work in that job function without the assistance of a full time employee that is fully qualified in the specified job function. If a minimum of 80% on a CBT test is not achieved, the CBT course must be taken again by the worker before retaking the CBT test.

5.3.5 Training Records

Training Records are maintained both electronically and manually. The WCS Training Records Database is used to keep training records electronically. The Training Records Database is utilized to continually review and delineate employees who are in need of an initial training or retraining. The Training Records Database creates workflow efficiencies by performing information download for the distribution of training reports, schedules and employee notifications. Furthermore, the Training Records Database provides detailed information on all institutional training courses, e.g., module description, length, instructor, status, etc. In addition to the electronic training records, hard copy attendance records are maintained in each employee's Training Folder.

5.3.6 Training Coordination and Performance Reporting

The WCS Training Department performs training coordination and performance reporting. Training coordination focuses on analyzing refresher training reports, planning training schedules, coordinating classes, reviewing class feedback, modifying the Training Records Database and providing training notifications for employees. Other activities include distributing course retraining materials,

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Retraining Reports and Employee Training Profiles. Coordination efforts are also provided to assist SMEs in the development and/or modification of training courses.

5.4 TRAINING CATEGORIES

5.4.1 Core Training Courses

Training courses are coordinated and tracked by the WCS Training Department. Courses are determined by employees' assigned work activities; however, each employee's training needs will automatically require the following core courses:

- Safety Orientation Training
- General Employee Training (GET)
- Sexual Harassment Awareness Training
- Preventing Workplace Violence Training
- Contingence Plan and Emergency Information List Locations Training
- Ergonomics
- Hazard Communication (HazCom)
- Bloodborne Pathogens
- Fire Extinguishers

The Training Records Database maintains a complete list of core training courses.

Summary of Core Training Courses	
SAFETY ORIENTATION	
<i>Audience</i>	All employees before the employee start their job duties
<i>Module Format</i>	Initial Training conducted by the Health & Safety Manager will be held prior to job assignment
<i>Brief Summary and Citation</i>	Emergency Plan and Fire Prevention [29CFR1910.38(a)(5)(i), (ii)(a) through (c) & (iii)], Personal Protective Equipment, Employees Safety Responsibilities, Reporting unsafe conditions/hazards, housekeeping responsibilities, reporting all injuries and our safety incentive program, Function of Plant Safety Committee and importance of Safety Awareness.
<i>Retraining</i>	Required if employee has been absent from the WCS for more than a one-year period, or whenever content changes
<i>Estimated Length</i>	2 hours
GENERAL EMPLOYEE TRAINING (GET)	
<i>Audience</i>	All employees within 30 days of placement
<i>Module Format</i>	Self-paced review of the GET Manual and administrative policies
<i>Brief Summary</i>	General Safety, Emergencies, Industrial Hygiene Program, Environmental Protection Program, Hazardous Waste Regulations, Computer Security, Radiation Safety, Quality Assurance Program and Facility Operations Overview.
<i>Retraining</i>	Required if employee has been absent from the WCS for more than a one-year period, or whenever content in the course changes

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Summary of Core Training Courses	
<i>Estimated Length</i>	8 hours
SEXUAL HARASSMENT AWARENESS	
<i>Audience</i>	All employees within 30 day of placement
<i>Module Format</i>	CBT Course
<i>Brief Summary</i>	This course is designed to teach employees to recognize and resolve sexually harassing behavior. Upon completion of this course, the employee will be able to help foster a workplace free of this improper behavior.
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
PREVENTING WORKPLACE VIOLENCE	
<i>Audience</i>	All employees within 30 day of placement
<i>Module Format</i>	CBT Course
<i>Brief Summary</i>	This course covers types of workplace violence, which workers are more vulnerable, how employers can help protect employees, and how employees can protect themselves. Suggestions for establishing a workplace violence program, how to deal with incidents, and what to do after an incident has taken place are also covered.
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
CONTINGENCY PLAN LOCATIONS AND EMERGENCY INFORMATION LIST LOCATIONS	
<i>Audience</i>	All employees within 30 day of placement
<i>Module Format</i>	CBT Course
<i>Brief Summary</i>	These 2 courses cover where to find the locations and information on our Contingency Plan and Emergency Information List.
<i>Retraining</i>	Annual
<i>Estimated Length</i>	15 minutes
ERGONOMICS	
<i>Audience</i>	All employees within 30 day of placement
<i>Module Format</i>	CBT Course
<i>Brief Summary and Citation</i>	This course defines ergonomics and describes how ergonomics can be used to prevent employee injuries. It also discusses the symptoms and treatment of different forms of cumulative trauma disorder, such as tendonitis and carpal tunnel syndrome. [General Duty Clause of Section 5(a)(1) of the Occupational Safety and Health Act (OSHA)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
HAZARD COMMUNICATION (HAZCOM)	
<i>Audience</i>	Employees who may be exposed to hazardous chemicals
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Information and training on hazardous chemicals in the workplace, hazard categories (i.e., flammable, carcinogenic, etc.) and chemical-specific information from material safety data sheets and labels [29 CFR 1910.1200(h)(1), (2)(i) through (iii) and (3)(i) through (iv)].
<i>Retraining</i>	Annual

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Summary of Core Training Courses	
<i>Estimated Length</i>	1 hour
BLOODBORNE PATHOGENS	
<i>Audience</i>	Employees who may be exposed to bloodborne pathogens
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Bloodborne diseases, PPE selection, decontamination, methods to reduce exposure [29 CFR 1910.1030(g)(2)(i); (ii)(A) through (C); (iii) through (vii)(A) through (N); (viii) and (ix)(C)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
PORTABLE FIRE EXTINGUISHER	
<i>Audience</i>	All employees within 30 day of placement.
<i>Module Format</i>	CBT Course and hands-on drills.
<i>Brief Summary and Citation</i>	Fire extinguisher use and fire hazards [29CFR1910.157(g)(1), (2), (4); 29CFR1910.38(b)(4)(i) and (ii)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour

5.4.2 Institutional Training Courses/Activities

A common set of Institutional Training Courses/Activities have been established. Formal training courses include items that are standard training items in industry, including Radiation Worker and HAZWOPER courses. Activities include physical exams, respirator fit tests and JPM. Classroom courses have formal lesson plans. The training courses identified are posted on the employee's training record by job title.

Refer to the Training Records Database for the complete list of courses and activities by job title. The following list is a general description of the most common courses.

Summary of Institutional Training Courses/Activities	
HAZARDOUS WASTE OPERATIONS (HAZWOPER)	
<i>Audience</i>	Employees who may be exposed to hazardous substances, health hazards or other safety hazards
<i>Module Format</i>	Classroom instruction with hands-on drills and field experience
<i>Brief Summary and Citation</i>	Site safety and health personnel, Hazards present, Use of PPE, Safe use of work practices, Safe use of engineering controls, Medical surveillance requirements, Site safety and health documents, flammable and combustible liquids [29CFR 1910.120(e)(1)(i) & (ii); (2)(i) through (vii); (3)(i) through (iv)].
<i>Retraining</i>	8 hours annually refresher training required
<i>Estimated Length</i>	40 hours of classroom instruction with hands-on drills
HAZARDOUS WASTE OPERATIONS SUPERVISOR	
<i>Audience</i>	Supervisors of hazardous waste workers

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Summary of Institutional Training Courses/Activities	
<i>Module Format</i>	Classroom instruction
<i>Brief Summary and Citation</i>	WCS' health and safety program, Employee training program, PPE program Spill containment program, Health hazard monitoring and techniques [29CFR 1910.120(e)(4)].
<i>Retraining</i>	Not required
<i>Estimated Length</i>	8 hours
RADIATION WORKER II	
<i>Audience</i>	Employees working with encapsulated and un-encapsulated radioactive materials and/or in radiation areas
<i>Module Format</i>	Classroom training with practical
<i>Brief Summary</i>	Technical and administrative topics including: radiation sources, biological effects, contamination control, exposure limits, surveys, postings, emergencies, and land disposal of wastes.
<i>Retraining</i>	Annual
<i>Estimated Length</i>	8 hours
RADIATION SAFETY TECHNICIAN	
<i>Audience</i>	Employees with radiation safety, protection and control responsibilities
<i>Module Format</i>	Classroom instruction with hands-on drills
<i>Brief Summary</i>	Radiation worker topics and dose calculations, shielding calculations, counting statistics and analysis methods (refer to Radiation Safety Technician Training Program as in LL-RSP-100.
<i>Retraining</i>	Every two years
<i>Estimated Length</i>	Estimated 40 hours classroom and 20 hours hands-on
WASTE ACCEPTANCE SPECIALIST	
<i>Audience</i>	Employees with waste acceptance and waste transfer responsibilities
<i>Module Format</i>	Classroom instruction with certification
<i>Brief Summary</i>	DOT and IATA instruction on the regulations pertaining to the shipment of Hazardous Waste and Radioactive materials. Basic and Advanced training includes proper shipping name determination, marking, labeling, placarding, and manifesting. Detailed training on the applicable Waste Acceptance Criteria (WAC), Waste Analysis Plan (WAP), and Waste Acceptance LLRW Plan (LLRW WAP).
<i>Retraining</i>	Every three years
<i>Estimated Length</i>	Estimated 140 hours classroom
BASIC RCRA	
<i>Audience</i>	Employees who may be exposed to hazardous/toxic waste
<i>Module Format</i>	CBT
<i>Brief Summary</i>	Introduction of RCRA regulations
<i>Retraining</i>	Annual
<i>Estimated Length</i>	2 hours
RADIATION WORKER I	
<i>Audience</i>	Site personnel who will not be radiation workers but still need more in-depth information on radiation safety
<i>Module Format</i>	Classroom training with practical

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Summary of Institutional Training Courses/Activities	
<i>Brief Summary</i>	Familiarization with radioactive hazards at the facility, including signage, differences between general employees and occupational exposed employees, prenatal radiation exposure to the embryo/fetus and resolution of student questions.
<i>Retraining</i>	Annual
<i>Estimated Length</i>	8 hours
HAZMAT GENERAL AWARENESS AND TRANSPORTATION SECURITY AWARENESS	
<i>Audience</i>	Employees dealing with hazardous materials
<i>Module Format</i>	CBT
<i>Brief Summary</i>	Information and training on general DOT shipping, placarding regulations and transportation security awareness comprised of six (6) modules. This is not the 16 or 24 hour DOT transportation courses.
<i>Retraining</i>	Every two or three years depending on job assignment
<i>Estimated Length</i>	1 hour/course
RESPIRATORY PROTECTION	
<i>Audience</i>	Employees that may wear respiratory protection, initially before first use
<i>Module Format</i>	CBT along with fit test and JPM
<i>Brief Summary and Citation</i>	Why respirators are used, how to ensure fit and seal, maintenance and inspection, emergency use, capabilities, donning and doffing [29 CFR 1910.134].
<i>Retraining</i>	Annual, or more frequently when there are changes in respiratory equipment
<i>Estimated Length</i>	2 hours
RESPIRATORY PROTECTION SUPERVISOR	
<i>Audience</i>	Supervisors of respirator wearers
<i>Module Format</i>	Self-paced or classroom training, with hands-on practical demonstrating knowledge
<i>Brief Summary and Citation</i>	Why respirators are used, how to ensure fit and seal, maintenance and inspection, emergency use, capabilities, donning and doffing [29 CFR 1910.134; ANSI Standard Z88.2-1992].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
HEARING CONSERVATION	
<i>Audience</i>	Employees in a hearing conservation program
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Effects of noise on hearing, purposes and characteristics of different types of hearing protection including use instructions, purpose of audiometric testing [29 CFR 1910.95(k)(1) through (3)(i) to (iii)].
<i>Retraining</i>	Annually
<i>Estimated Length</i>	1 hour
FALL PROTECTION	
<i>Audience</i>	Employees who may be exposed to fall hazards
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards [29 CFR 1926.503(a)(1) and (2)(ii) through (vii)].
<i>Retraining</i>	Annually

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Summary of Institutional Training Courses/Activities

<i>Estimated Length</i>	1 hours
EXCAVATIONS AND TRENCHES	
<i>Audience</i>	Employees inspecting excavations and trenches
<i>Module Format</i>	Classroom or CBT training
<i>Brief Summary and Citation</i>	Training to be capable of identifying existing and predictable hazards in the surroundings, identification of dangerous conditions and has how to take prompt corrective measures to eliminate them [29 CFR 1926.651, 1926.652, 1926 Subpart P Appendices A and B].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	2 hours
LADDER SAFETY	
<i>Audience</i>	Each employee using ladders as necessary
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Recognition of hazards related to ladders and steps to be followed to minimize these hazards. [29 CFR 1926.1060(a)(i) through (v) and (b)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
ASBESTOS AWARENESS	
<i>Audience</i>	Employees who may be exposed to asbestos hazards
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Employees who may be exposed to airborne concentrations of asbestos at or above the PEL and/or excursion limit and ensure their participation in the program. [1910.1001(j)(7)(i) through (iii)(A) through (H)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1
POWERED INDUSTRIAL TRUCKS (FORKLIFTS)	
<i>Audience</i>	Operators of Powered Industrial Trucks (Forklifts)
<i>Module Format</i>	Classroom training, hands-on training and JPM
<i>Brief Summary and Citation</i>	Safe operation and inspection of powered industrial trucks and material handling equipment [29 CFR 1910.178(1), ANSI Standard B56.1-1969, <i>Safety Standards for Powered Industrial Trucks</i>].
<i>Retraining</i>	Every three years
<i>Estimated Length</i>	4 hours
DOT HAZARDOUS MATERIAL TRANSPORTATION	
<i>Audience</i>	Employees who affect the safe transportation of hazardous materials, including hazardous waste
<i>Module Format</i>	Classroom training
<i>Brief Summary and Citation</i>	Overview of DOT requirements, functional training (manifests, shipping names), safe packaging and emergency response [49 CFR 172.700].
<i>Retraining</i>	Every three years to encompass regulatory change cycle
<i>Estimated Length</i>	24 hours

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Summary of Institutional Training Courses/Activities

DOT RADIOACTIVE MATERIAL TRANSPORTATION	
<i>Audience</i>	Employees who affect the safe transportation of radioactive materials, including mixed waste
<i>Module Format</i>	Classroom training
<i>Brief Summary and Citation</i>	Overview of DOT requirements, functional training (manifests, shipping names), safe packaging and emergency response [49 CFR 172.700].
<i>Retraining</i>	Every three years to encompass regulatory change cycle
<i>Estimated Length</i>	16 hours
PERMIT REQUIRED CONFINED SPACE ATTENDANT/ENTRY/RESCUE	
<i>Audience</i>	Employees entering permit-required confined spaces
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Review of potential hazards and requirements for permit required confined spaces [29 CFR 1910.146(g)(1) and (2)(i) through (iv)(3) and (4) and (k)(1)(i) through (iv)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
PERSONAL PROTECTIVE EQUIPMENT	
<i>Audience</i>	Employees who will wear PPE
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	When PPE is necessary, selection of PPE, how to wear, adjust, care for, and dispose of PPE [29 CFR 1910.132(f)(1)(i) through (v); (2), (3)(i) through (iii) and (4)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
LOCKOUT/TAGOUT AND ELECTRICAL SAFETY	
<i>Audience</i>	Employees that will work with energized systems
<i>Module Format</i>	CBT
<i>Brief Summary and Citation</i>	Training to develop the knowledge and skills required for the safe application, usage, and removal of energy controls. [1910.147(a)(3)(ii); (4)(i)(D); (7)(i)(A) through (C); (ii)(A) through (F); (iii)(A) through (C)(iv) and (8)].
<i>Retraining</i>	Annual
<i>Estimated Length</i>	1 hour
ADULT CARDIOPULMONARY RESUSCITATION	
<i>Audience</i>	Members of the emergency response team and interested employees
<i>Module Format</i>	Classroom training and skills evaluation
<i>Brief Summary and Citation</i>	Standardized course as provided by the American Red Cross or an equivalent organization [29 CFR 1910.269(b)(1)(i)].
<i>Retraining</i>	Every two years
<i>Estimated Length</i>	8 hours

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Summary of Institutional Training Courses/Activities

BASIC FIRST AID	
<i>Audience</i>	Members of the emergency response team and interested employees
<i>Module Format</i>	Classroom training and skills evaluation
<i>Brief Summary and Citation</i>	Standardized course as provided by the American Red Cross or an equivalent organization [29 CFR 1910.269(b)(1)(i)].
<i>Retraining</i>	Every two years
<i>Estimated Length</i>	8 hours

5.4.3 Quality Assurance Indoctrination and Training

WCS employees who perform quality affecting work activities will receive Quality Assurance (QA) Indoctrination Training (which is covered in our GET Manual). This training includes general criteria, including introduction to applicable codes, standards, QA Procedures, QA Program elements and job responsibilities and authorities. WCS personnel assigned to perform quality affecting work activities are also required to complete training in the specific procedures needed to perform their job roles and responsibilities as assigned by their supervisor. Detailed QA training is provided on the QA Program and job specific procedures prior to an employee beginning work. WCS managers are responsible for assuring that personnel performing work under their supervision are appropriately trained.

5.4.4 Job (Activity) Specific Training

Job (Activity) Specific Training (JAST) is the responsibility of each employee's manager and is designed to address the training aspects that relate to the employee's specific work location. This includes a review of the Group/Sections policies and procedures along with OJT for specialized equipment. As JAST consists of training on individual activities, it is not necessary that instructions be given using formal lesson plans; however, the Group/Section Leader must maintain accurate operator aids, procedures, or manufacture equipment manuals. Furthermore, they must maintain a sign-off record that indicates which employees have been trained on the specialized activity. Refer to the Training Matrix for the complete list of courses and activities by position.

5.4.5 Classroom Training

In certain cases, classroom training may be the most effective way to present material. A "Lesson Plan" form may be used, but is not required. An "Attendance Form" can be used to record attendance at any training session. A "Training Completion Form" can be used when recording any training completion. All of these forms can be obtained from the Training Department.

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5.4.6 On-the-Job Training

OJT allows workers to learn as they work, hands-on, and understand the relationships between steps executed in order as a skill or procedure is learned. OJT is acceptable after the corresponding hazard/radiation training is completed. In general, this training at first entails direct guidance and instruction by the immediate supervisor or senior staff members, but continues with the reduced guidance until the trainee can pursue independent phases of work projects with only general supervision. Pertinent reading of associated procedures and equipment manuals is also assigned. Completed OJT can be documented on our "Training Completion Form".

5.4.7 Preplanning/Mock-Up Training

Effective planning before a complicated, uncommon or potentially hazardous job can reduce the risks of error, injury or exposure. Preplanning allows time to evaluate the job, determine the best way to do it, and resources (manpower, equipment, supplies) needed. Mock-ups and dry runs can sharpen skills and increase speed and safe execution of a task. The four considerations are:

- Identify site conditions that may affect execution
- Develop the steps for the job at hand
- Determine if an existing procedure is applicable
- Practice the steps with the work group to achieve competency

The Radiation Safety Officer (RSO) and radiation protection staff will be involved in pre-planning and mock-up training involving work with radiation or radioactive materials.

A "Lesson Plan" form may be used, but is not required. An "Attendance Form" can be used to record attendance at any training session. A "Training Completion Form" can be used when recording any training completion. All of these forms can be obtained from the Training Department.

5.4.8 Emergency Response Team Training

The Training Matrix includes a column marking course required for Emergency Response Team members. In virtually all cases, the courses are required as part of a worker's operational position. In addition, the team needs to be able to work as a coordinated group, and preparation will be enhanced with additional

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training opportunities and exercises. A summary of the training with emphasis on specific areas of concern is on the next page. These course and activities are the foundation of emergency response team training.

Summary of Emergency Response Team Training (Refer to the Training Records Database for Current Information)	
CORE Training (See list 5.4.1)	Respiratory Protection
Basic RCRA Training	Respiratory Protection Practical Evaluation
40 Hour HAZWOPER	Respirator Fit Test
8 Hour HAZWOPER Annual Refresher	Annual Physical Exam – for respirator users
Radiation Worker II (RST Training for RSTs)	Adult Cardiopulmonary Resuscitation (CPR)
Radiation Worker II Practical Evaluation (RST Training for RSTs)	Basic First Aid
Radiation Worker II Annual Refresher (RST Training for RSTs)	Emergency Response Plans
HAZMAT General Awareness	Annual Physical Exam
Permit Required Confined Space Attendant/Entry/Rescue Training	Personal Protective Equipment Training

5.4.9 Performance-Based Training

Training shall be performance-based with all personnel maintaining at least 80% percent passing scores. All lesson plans shall be based on performance objective and include examinations. Personnel not scoring greater than 80% shall receive retraining/retesting to ensure that they understand what was missed.

5.4.10 Hands-on Training

Training will include as much hands-on activities as practical. These should include operation of the fire-fighting equipment, spill cleanup equipment, first-aid supplies, etc.

5.4.11 First Aid and CPR

CPR and First Aid courses will be required for those individuals selected to perform CPR and first aid functions.

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5.4.12 Drills and Exercises

Drills and Exercises training will consist of the following:

- Orientation drills to familiarize staff with facility procedures, such as building evacuation drills when the primary purpose is for personnel to evacuate of the building to assembly point via the proper exit.
- Tabletop exercises conducted to allow for participant discussions regarding what they would do in a real emergency situation, understanding of the emergency response process and problems that the other responsible agencies, departments and personnel may encounter. The tabletop exercise will be expanded to include a physical walk-through of the drill by site personnel at the planned location. The tabletop exercises and walkthrough are invaluable in providing properly learned responses to actual emergency situations.
- Functional drills and exercises including fire drills that test the Emergency members using a possible building evacuation with the scope limited to a simple scenario to train or test a small group of responders.
- Full-scale exercises usually involving complicated scenarios where multiple emergency response members are needed to deal with fire, injuries, contamination, or other issues. Full-scale exercises are usually a combination of multiple, functional and tabletop exercises in order to assure maximum effectiveness during the full-scale exercise. Full-scale exercises are usually preceded by internal tabletop and dry run exercises. Each of these exercises will be properly planned and documented by the Emergency Coordinator.

5.4.13 Additional Training Courses

Other courses may be added as deemed necessary by the Director Environmental, Health and Safety and/or the RSO. They will determine which courses are needed by which personnel as a function of their duties. Safety and/or Radiation Training Courses will consist of prepared course materials. They will cover specific topics and will be presented by the appropriate SME.

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5.4.14 Visitor Orientation Training

All visitors to WCS shall receive visitor orientation training based upon their activities. Additional training beyond receipt of visitor orientation training will be determined jointly by the Health and Safety Manager and the operational manager responsible for the visitor before the visit. The Training Department will ensure the additional training, if any, is completed before the visitor performs their task(s).

5.4.15 Contractor Orientation Training

Contractor employees working within the WCS permitted facility must complete contractor orientation training before entering the site. Contractor Orientation Training must be repeated on an annual basis. The purpose of this training is to inform contract employees of:

- Facility rules
- Work Permits
- Facility layout
- Hazards present at the site
- Hazard Communication
- Emergency and safety equipment use and availability
- Contingency and Emergency Response
- Radiation Effects Orientation

The objective of this training is to provide a direction to protect employees (including contractors), the environment and facility equipment to document that each employee understands the WCS policies.

5.4.16 Inspection Personnel Training

This section provides requirements for the qualifications of personnel who perform inspections to verify conformance to inspection procedures and specification requirements for the purpose of acceptability.

Quality Control (QC) inspection personnel assigned to perform quality-affected inspections will be supplied by an Inspection Service Contractor whose training and qualification program has been approved by the WCS QA Manager.

The contractor's QC inspector training and qualification program shall include: (1) Personnel-verifying activities affecting quality are trained and qualified in the principles, techniques and requirements of the activity being performed; (2) Proficiency test are given to those personnel performing and verifying activities affection quality and acceptance criteria are developed to determine if individuals are properly trained and qualified; (3) Certificate of qualifications clearly

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delineates (i) the specific functions personnel are qualified to perform and (ii) the criteria used to qualify personnel in each function; and (4) Proficiency of personnel performing and verifying activities affecting quality is maintained by retraining, reexamining and/or recertifying as determined by management or program commitment.

5.5 PERFORMANCE CHECKLISTS

The following checklists provide the responsible actions for satisfying key training objectives.

All Employees – Shall:

- Acquire Training Curriculum needed for their job assignment with the assistance of their Group/Section Leader and the Training Department.
- Complete General Employee Training and all other mandatory training courses that are identified from their Training Curriculum.
- Attend retraining events in accordance with a training course's prescribed retraining date.
- Review the WCS's procedures that are required to perform their job assignment.
- Respond to monthly training announcements, attend classes and/or complete CBT courses as assigned by the Training Department.
- Follow the Visitor's Procedure any guests, equipment vendors, etc., that are visiting the Waste Control Specialists site.
- Acquire an Employee ID number from the Training Department, which will be used to track and record all training assigned into our Training Records Database.

SMEs – Shall:

- Review requirements and regulations for associated training requirements.
- Develop and modify training lesson plans for their technical specialty.
- Present training courses that rely on their technical expertise and track employee compliance with these courses.

Training Department – Shall:

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- Verify that each employee has been assigned a Training Curriculum and information is entered into the Training Records Database.
- Register each person for General Employee Training when they are going through the WCS's new employee check-in process.
- Update the Training Records Database and employee training record files accordingly, e.g., new hires, terminations, reassignments, etc.

Department Managers – Shall:

- Ensure that their employees have completed and stay up-to-date on all mandatory training courses that are identified by the employees Training Curriculum.
- Establish work scope and related training requirements for each position and communicate these requirements to the Training Manager.
- Identify all job activities that each employee will be performing and provide the appropriate JAST to ensure that they can perform all work activities in a safe manner.
- Ensure that their employees review the WCS procedures that are required to perform their job assignment.
- Review the training reports that are sent out monthly and assure that their employees attend training as required.
- Ensure that JAST Training sign-off records are completed at the completion of each training activity and are turned in to the Training Department for filing.
- Follow the Visitor's Procedure for any guest, equipment vendors, etc., that is visiting the WCS site.

Training Manager – Shall:

- Oversee all training functions at the WCS site.
- Coordinate all course offerings and Special Session Training, e.g., monthly schedule, announcements, registrations, examinations, reminders, room and equipment setup, etc.
- Monitor all Training records, statistics and costs.
- Coordinate with SMEs on the development of and modifications to training lesson plans.
- Oversee the Training Records Database and training records.
- Update training forms, procedures, policies, etc., as required.

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5.6 EXAMPLE OF TRAINING REQUIREMENTS

The following is an example of training requirements by job title. Refer to the Training Records Database for current training curriculum by job title.

Training Requirements by Job Title

Job Title: Waste Acceptance Specialist

Title	Facility
40 Hr. HAZWOPER	Waste Control Specialists
8 Hour HAZWOPER Refresher	Waste Control Specialists
Advanced - Radioactive Material Shipper Certification Training	Waste Control Specialists
Advanced Hazardous Waste Shipper Certification Training	Waste Control Specialists
Advanced Mixed Waste Shipper Certification	Waste Control Specialists
Annual Medical Physical Examination	Waste Control Specialists
Annual Medical Physical Examination-For Respirator Users	Waste Control Specialists
Basic Hazardous Materials Transportation Training	Waste Control Specialists
Basic Hazardous Waste Transportation Training	Waste Control Specialists
Basic Radioactive Material Transportation Training	Waste Control Specialists
Basic RCRA	Waste Control Specialists
Bloodborne Pathogens	Waste Control Specialists
DOT Hazardous Waste Shippers Training	Waste Control Specialists
Ergonomics	Waste Control Specialists
Fall Protection	Waste Control Specialists
Fire Extinguisher Basics	Waste Control Specialists
General Employee Training	Waste Control Specialists
Hazard Communication	Waste Control Specialists
Hazardous and Radioactive Materials (IATA) Training	Waste Control Specialists
HAZMAT Lab General Awareness and IATA	Waste Control Specialists
HAZMAT Transportation Security Awareness	Waste Control Specialists
Health and Safety Orientation	Waste Control Specialists
PCB Awareness	Waste Control Specialists
Portable Fire Extinguishers	Waste Control Specialists
Rad Worker II	Waste Control Specialists
Rad Worker Practical Evaluation	Waste Control Specialists
Sexual Harrassment Awareness: Managers	Waste Control Specialists
Special Nuclear Materials Training	Waste Control Specialists
Storm Water Pollution Prevention Plan	Waste Control Specialists
Violence in the Workplace	Waste Control Specialists
Waste Acceptance Criteria (WAC)	Waste Control Specialists
Waste Acceptance LLRW Plan (LLRW WAP)	Waste Control Specialists
Waste Analysis Plan (WAP)	Waste Control Specialists
WCS Contingency Plan Location Training	Waste Control Specialists
WCS Emergency Information Training	Waste Control Specialists

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6.0 RECORDS

6.1 Records demonstrating performance of this procedure shall be created and retained in accordance with all:

6.1.1 Applicable statutory and regulatory requirements; and

6.1.2 Supplemental WCS records management policies and procedures.

6.2 The following completed and authenticated documents are official WCS records:

6.2.1 All training records are maintained for the operational life of the facility.

7.0 REFERENCES

7.1 Code of Federal Regulations - 29 CFR 1910

7.2 Code of Federal Regulations - 49 CFR 172

7.3 NUREG/CR-3343

7.4 30 TAC §336.404(a)

WASTECONTROL SPECIALISTS LLC

CHANGE OF STATUS HR-1.1.1-1

CURRENT STATUS		
<i>Last Name:</i>	<i>First Name:</i>	<i>MI:</i>
<i>Employee Social Security Number:</i>		
<i>Department:</i>	<i>Location:</i>	<i>Position:</i>
<i>Current Pay Rate:</i> _____-Hourly _____-Salary	<input type="checkbox"/> <i>Full-time</i> <input type="checkbox"/> <i>Part-time</i> <input type="checkbox"/> <i>Temp</i>	<input type="checkbox"/> <i>Seasonal</i> <input type="checkbox"/> <i>Inactive (leave, layoff, etc.)</i>
<input type="checkbox"/> <i>Exempt from Overtime</i>		

STATUS CHANGE		
<i>(Fill in all items which have changed; for New Hires fill out Current Status, Action and Effective Date.)</i>		
ACTION:	EFFECTIVE DATE:	
POSITION CHANGE: <i>Department:</i>	<i>Position:</i>	<i>Location:</i>
<input type="checkbox"/> <i>Full-time</i> <input type="checkbox"/> <i>Part-time</i> <input type="checkbox"/> <i>Temp</i> <input type="checkbox"/> <i>Seasonal</i> <input type="checkbox"/> <i>Inactive (leave, layoff, etc.)</i>		
PAY CHANGE: (new rate)		
_____-Hourly _____-Salary <input type="checkbox"/> <i>Exempt from Overtime</i> Type of change:		
PERSONAL:		
<i>Last Name:</i>	<i>First Name:</i>	<i>MI:</i>
<i>Address:</i>	<i>City:</i>	<i>State:</i> <i>Zip:</i>
REMARKS:		

APPROVAL: (All approvals should be attained before communicating to employee.)	
<i>Department Manager:</i>	<i>Date:</i>
<i>General Manager:</i>	<i>Date:</i>
<i>Controller:</i>	<i>Date:</i>
<i>Human Resources:</i>	<i>Date:</i>

ATTENDANCE FORM

MEETING TYPE:

WCS Training Program
 Safety Briefing
 Technical Briefing
 Pre-Job Briefing
 Other

MEETING SUBJECT:

DATE:	START-TIME:	STOP-TIME:	LOCATION:

	PRINT STUDENT / ATTENDEE NAME	I.D. #	STUDENT / ATTENDEE SIGNATURE	SCORE
1.				
2.				
3.				
4.				
5.				
6.				
7.				
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9.				
10.				
11.				
12.				
13.				
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15.				
16.				
17.				
18.				
19.				
20.				

PRINT INSTRUCTOR / FACILITATOR NAME	I.D. #	INSTRUCTOR / FACILITATOR SIGNATURE	DATE

Form TRN-1.0-2

**FORWARD ALL WCS TRAINING PROGRAM ATTENDANCE RECORDS TO THE TRAINING MANAGER
RETAIN ALL OTHER ATTENDANCE RECORDS IN DEPARTMENTAL OR PROJECT LEVEL FILES AS APPROPRIATE**

FORM TRN-1.0-3 LESSON PLAN

Topic: _____ Attach copies of handouts
Instructor: _____ Attach copies of written tests
Course Length: _____ (hours/days)

Equipment: _____

Objectives: _____

Testing: _____

Following presentation of training:
Review of Course: _____

Suggestions for Improvement: _____

Lesson Plan Development

PURPOSE OF LESSON PLANS

1. Provide instructional cues.
2. Organize timing and sequence.
3. Allows others to teach in your absence.
4. Source of test items.
5. Can use to cross check for repetition among instructors.
6. Equipment and room setup checklist for instructor, coordinator or provider.

INGREDIENTS OF A LESSON PLAN

1. Time allocation
2. Room setup
3. Equipment needed
4. Handouts/trainee reference materials needed
5. Content notes
6. Type of test
7. Objectives/points
8. Methods of instruction
9. Exercises/activities for participants
10. Instructions or materials for activities

METHODS OF INSTRUCTION - EXAMPLES

- lecture
- demonstration
- discussion
- role playing
- work books
- games
- case study
- simulation

CONSIDERATIONS WHEN DEVELOPING LESSON PLANS

Instructors are required to develop Lesson Plans for the subject matter which they present. When developing their Lesson Plans, the instructors should assume that the target population of most training classes is the entry level employee with no prior training or experience, even though some trainees may have prior experience. Regardless, the assumption of no prior training or experience ensures that the training course will cover the needs of all entry level personnel, even those with no prior background at all.

Also, it is important to be aware that classroom/practical training is not intended to produce a fully trained, experienced employee capable of handling every job assignment. At best, formal training can only simulate job demands and conditions. The training can and should provide the trainee with the basic concepts, knowledge, and

skills necessary to make sense of the job tasks and accelerate the on-the-job learning process.

STEPS TO DEVELOPING LESSON PLANS

1. Review outline, performance objectives, related core tasks, knowledge skill maps, and testing requirements.
2. Decide instructional content.
3. Organize into learning sequence.
4. Match instructional content with appropriate methodology.
5. Write instructions for participant involvement, exercises and activities.
6. Develop handouts, supporting reference material.
7. Identify equipment needed.
8. Decide room set-up.
9. Allocate time for each sequence.
10. Decide when testing is given. (80% minimum score is required)
11. Perform dry run, review and revise.

FIVE RULES OF LESSON PLAN DEVELOPMENT

1. Avoid Brain Dump
2. Match Method to Topic
3. Avoid Expert Syndrome - Keep to the Basics
4. Plan Participant Involvement
5. Conduct Dry Run

AVOIDING REPETITION IN CORE COURSES

Some repetition is okay and is built into the course to reinforce important aspects. Repetition is not okay if unintentional. Example: two different instructors show same video. It happens!

Ways to avoid:

1. Look at entire outline and all performance objectives to see where your piece fits in.
2. Share your Lesson Plan with other instructors.
3. Coordinator identifies closely related modules, alerts instructors to potential overlap.
4. Compare test questions. If questions are the same for two different modules, it may mean instructors are not clear on scope of their presentation.

FORM TRN-1.0-4 TRAINING COMPLETION FORM

Date: _____

Employee's Name: _____ Employee's ID number: _____

Training Completed: _____

I have completed the above training and feel that my understanding of the materials presented is complete. I feel I am able to perform job functions requiring this training without reservation. I have reviewed missed questions and their correct answers on written exams.

Student Signature

Date

Instructor Use:

Type of testing:

_____ Written

_____ Not Applicable

_____ Oral

_____ Practical Exercise/OJT/Mock-up

Test results: _____ Number of Correct Responses (a) _____ % (a/b *100)

_____ Total Number of Questions (b)

Test results: _____ PASS

_____ FAIL

(A minimum score of 80% is required for verification of effective training.)

Trainer Signature

Date