

TRAIN-1 GENERAL TRAINING REQUIREMENTS

A. PURPOSE: Assuring a safe work environment, preventing the spread of contamination, and constantly striving to improve the quality of work requires consistently applied training in the technical and practical aspects of Clive Site operation. Also, regardless of an individual's background, some directed on-the-job training is needed to function efficiently. While such training is an on-going effort, this procedure outlines the minimum training required for each of the Clive Site positions.

B. REFERENCES OR AUTHORITY:

1. Rad. Material License UT 2300249, Amend. #14 dated 09/10/93, Condition 34;
2. Application for Radioactive Materials License UT 2300249 dated 3/21/91, Section; 7.4.3, 8.3, and Appendix C;
3. RCRA Permit issued 11/30/90, Revised 7/92;
4. 29 CFR 1910.120;
5. 49 CFR 172, Subpart H;
6. Envirocare of Utah, Inc - Quality Assurance Manual; and,
7. 11e.(2) Rad. Material License SMC-1559, dated 11/19/93.

C. PRECAUTIONS AND LIMITATIONS:

1. New employee indoctrination and training is conducted in accordance with procedure INDOC-1 of this manual.
2. Employee training files are considered to be records affecting quality and are retained as a part of the operating record with duplicate copies forwarded to the Envirocare Corporate Office in accordance with reference 6.
3. All employees must complete the required hazardous waste training within six months of their hire date or of beginning to work in hazardous waste management, unless the employee or contractor is terminated or resigns. No grace period applies to completion of this training. Employees shall not work in unsupervised positions until they have completed the training requirements specified below.
4. All temporary employees and contractors must receive the required hazardous materials training within forty-five days from the first day of work at the facility.

D. GENERAL INSTRUCTIONS:

1. All employees, contractors, temporary employees, and visitors must satisfy the minimum training requirements necessary to their work assignments and/or potential exposure to radioactive and/or hazardous materials. In addition, training is provided to achieve initial proficiency, maintain proficiency, and to adapt to changes in technology, methods, or job

TRAIN-1 GENERAL TRAINING REQUIREMENTS

responsibilities. As such, this procedure is applicable, in whole or in part, to anyone working within Envirocare's Controlled Area or who enters Envirocare's Restricted Area.

2. A summary of the general training requirements is as follows:

a. Initial Restricted Area Entrance Training is required of everyone entering the Restricted Area in accordance with reference 2, Section 7.4.3. covering precautions, procedures, alarms and warnings, and emergency response.

b. Initial three-hour radiation safety training and exam is required for permanent employees in accordance with reference 2, Section 7.4.3. This training is normally given as needed one day of each week and will be conducted by the Site or Corporate RSO (or a designated and qualified Health Physics Radiation Technician or contracted instructor). The focus of the training is on familiarization with radioactivity and radiation and methods of keeping exposures as low as reasonably achievable. Because the nature of the material being handled and the procedures used are expected to keep exposures well below occupational standards, the primary interest is in keeping worker exposures which do occur as low as reasonably achievable. The course will include the following items and topics:

- 1) radioactivity and radiation;
- 2) ionizing radiation and biological effects;
- 3) radioactive nature of the material being handled;
- 4) fundamentals of handling radioactive materials;
- 5) radiation safety standards, principles and procedures;
- 6) methods of radiation protection;
- 7) ALARA concepts and applications;
- 8) Envirocare's ALARA plan;
- 9) emergency procedures;
- 10) presentation to each trainee of a personal copy of the training manual;
- 11) a question and answer period; and,
- 12) Radiation Worker Exam. This exam must be passed with a minimum score of 70%.

c. One-hour training in respiratory protection (as applicable) and a respirator fit test must be performed by a qualified respiratory protection technician.

d. Training and familiarization of the appropriate Site Regulations is required.

e. The initial Department of Labor (DOL) required OSHA training in accordance with reference 4. At a minimum, the twenty-four hour training requirements for a treatment, storage, or disposal facility must be satisfied. Alternatively, equivalent

TRAIN-1 GENERAL TRAINING REQUIREMENTS

training may be certified. See procedure INDOC-1 for the guidelines for this determination.

f. Two-hour hazardous waste management introductory orientation training from the new employee's immediate supervisor is required in accordance with reference 3, Attachment II-4. This training acquaints the new employee of the basic site operations and procedures relative to hazardous waste management.

g. As outlined in reference 3, Attachment II-4, ten hours of classroom instruction is required prior to working unsupervised in hazardous waste management. Those items completed as part of the OSHA training required in reference 4 which duplicate the classroom training requirements of reference 3 may be omitted from this ten hours of classroom instruction.

h. In accordance with reference 3, Attachment II-4, on-the-job training is provided to an employee or contractor (and documented), between the time that the employee or contractor receives the introductory orientation training and the time the employee or contractor attends the classroom instruction and training. When an employee or contractor receives the classroom training prior to being assigned to work in hazardous waste management, the on-the-job training must be provided, documented, and signed within six months of beginning work in hazardous management. An employee or contractor who has not completed the classroom instruction and training will always work under supervision.

i. The reference 5, training requirements will be satisfied by successful completion of the OSHA and hazardous waste management training noted in D.2.e. through h. above. In accordance with reference 5, this training is required to be certified as meeting the requirements of reference 5. Each individual's training record will be annotated as such upon completion of the general training requirements.

j. Emergency response training shall be included as an integral part of all the training noted above.

* Note: Completion of general training requirements D.2.a. through d. qualifies an individual as a radiation worker, and as such, qualifies the individual to:

- a. handle radioactive materials and packages;
- b. decontaminate vehicles, equipment, and packages;
- c. work around radioactive materials; and,
- d. perform emergency actions to control radioactive materials, as needed.

TRAIN-1 GENERAL TRAINING REQUIREMENTS

3. A summary of the required periodic training is as follows:
 - a. One-hour semi-annual refresher training is required to review the material covered during the initial three-hour radiation safety training, in accordance with reference 2. This training must be completed within six calendar months of the original three-hour radiation safety training. Training will include a review of the biological effects of radiation, regulatory standards and radiation safety practices, with the emphasis on ALARA.
 - b. Eight-hours of annual refresher training on the DOL required OSHA training is required to review the material covered during the initial OSHA training, in accordance with reference 4. This refresher training must be completed by the last day of the twelfth month following completion of the initial OSHA training.
 - c. Four hours of annual training on hazardous waste management is required to review the material covered during the initial ten-hour hazardous waste management training, in accordance with reference 3. Those items completed as a part of the OSHA refresher training (required in reference 4) which duplicate the hazardous waste refresher training requirements of reference 3 may be omitted from this requirement. A thirty-day grace period applies to this requirement in accordance with reference 3., therefore, this training must be completed by the last day of the twelfth month following completion of the initial ten-hour hazardous waste management training.
 - d. Bi-annual recurrent DOT hazmat employee training is required in accordance with reference 5. Those items completed as a part of the OSHA refresher training and the annual training on hazardous waste management which duplicate the reference 5 recurrent training requirements may be omitted from this bi-annual recurrent DOT hazmat employee training. This recurrent DOT training must be certified as completed by the last day of the twelfth month following certification of completion of the initial DOT training.
 - e. An annual contingency plan drill is to be performed by the Clive site implementing each aspect of the contingency plan as defined by reference 3.
 - f. Annual hazard communication training is required in accordance with reference 4, section .1200 and as described in the MSDS program binder.
4. All Envirocare Clive Site employees are required to attend at least 20 hours of continuing training annually by qualified personnel as determined by the Site Manager. This training is to be tailored to the specific employee's needs and duties and will conform to the requirements of the training program as outlined below (reference 2).

TRAIN-1 GENERAL TRAINING REQUIREMENTS

5. Completion of an Envirocare Qualification Form for a specific job task qualifies that individual to perform at least those activities they were required to satisfactorily perform or discuss as a part of completing the original qualification form. The Qualification Form must be completed within four months of commencement and upon completion shall be filed in the individual's training record.

6. The Site Manager or cognizant Corporate Manager can sign in lieu of any signatory on the Qualification Forms. An individual may sign for the designated signatory if qualified to the same level. Also, for general knowledge requirements/prerequisites, an individual may sign if acting in the signatory's capacity and delegated signature responsibility in writing by the signatory. Regardless, unless qualified, an individual shall not sign for performance objectives, knowledge level, or certification/authorization requirements on Qualification Forms.

7. If previous experience or education indicate that little benefit would be realized for the candidate by accomplishing any particular Qualification Form item, the Envirocare Executive Vice President, or his written designee, may waive any or all of the Qualification Form items with the exception of the Certification/Authorization signature.

8. In accordance with reference 6, a certification record (Figure XI-1) must be kept of all completed qualifications; delineating the name of the candidate, the date of certification and the date of certification expiration, the type of qualification or the activities certified to perform, a record of any questions asked and the grade assigned to the response for certifying an appropriate level of knowledge, and the signature of the interviewer and/or certifier. This qualification certification form shall also be filed in the individual's training record.

9. Qualification Forms should include the following basic information:

- a. References
- b. General Knowledge Requirements/Prerequisites
- c. Performance Objectives (On-the-Job Training (OJT))
 - Observe the performance objective
 - Perform the performance objective while supervised
 - Supervisor provide evaluation of performance
- d. Level of Knowledge
 - Written test (if appropriate)
 - Oral interview
- e. Certification/Authorization

10. Envirocare Qualification Forms are attachments to this procedure and include:

- a. Security Guard/Radiation Monitor - I
- b. Radiation Monitor - II

TRAIN-1 GENERAL TRAINING REQUIREMENTS

- c. Health Physics Radiation Technician
- d. Environmental Monitor Technician
- e. Environmental Coordinator
- f. ARCS Coordinator - I
- g. ARCS Coordinator - II
- h. Dust Control Technician
- i.a Quality Control Engineering Technician - I
- i.b Quality Control Engineering Technician - II
- j. Sample Control Officer
- k. Gamma Spectroscopy/Radiological Lab Technician - I
- l. Weather Station Monitor Technician
- m. Mixed Waste Inspector
- n. Safety Officer
- o. Groundwater Monitoring Technician - I
- p. Chemistry Lab Analyst - I
- q. Chemistry Lab Analyst - II
- r. Training Instructor
- s. Training Officer
- t. Document Control Officer
- u. Respiratory Protection Technician
- v. Certified Driver
- w. Emergency Response Coordinator

E. OPERATING INSTRUCTIONS:

1. At the beginning of each calendar quarter, the Training Officer (or qualified designee) will update the "Long Range Training Plan". The LRTP establishes a loose schedule for the training to be given during the next calendar year and includes the periodic training identified in D.3 above. The LRTP shall identify the goals of training for each inclusive calendar quarter. Assignment of topics and lecturers for the training should be consistent with the stated goals for the quarter. About twenty percent of the quarter's assigned lecturers should remain unidentified until the Short Range Training Plan (SRTP) is prepared so as to have the time available for emergent training issues.

2. At the beginning of each calendar quarter, the Training Officer (or qualified designee) will prepare the "Short Range Training Plan". The SRTP specifically schedules the training to be given during the upcoming quarter and assigns qualified instructors to conduct the training consistent with the stated goals and the loose schedule identified in the LRTP.

3. At least two days before the scheduled training, the instructor assigned to present the training will prepare and submit a training lesson plan to the Training Officer (or qualified

TRAIN-1 GENERAL TRAINING REQUIREMENTS

designee) for review and/or suggestions. This lesson plan will be filed for reference in preparing for similar training in the future. The lesson plan will include:

- a. The title and/or type of training;
 - b. references;
 - c. objectives of the training;
 - d. training outline;
 - e. the estimated time required to complete the training; and,
 - f. a list of the training aids needed - including copies of any transparencies.
4. All permanent Envirocare employees with the exception of administrative office personnel will complete the general and periodic training requirements summarized in D.2 and 3 above.
5. A record (Figure XI-2) must be kept of all safety training provided to Envirocare, contractor, and temporary employees detailing the name of the instructor, the topic or type of training, a summary of the training provided, a list of attendees, and the date and time of the training in accordance with references 5 and 6. Regular safety training is normally given one day of each week.

F. QUALITY CONTROL:

1. The quality and consistency of initial training is assured by formally qualifying personnel to their specific job assignments. This is accomplished by ensuring each individual demonstrates the adequate skill and level of knowledge needed to perform the job assignment and is certified/authorized by the proper corporate authority.
2. The quality of training is assured by using qualified instructors and approved lesson plans in accordance with an established training schedule and meeting specific objectives. In addition, the Site Manager approves the SRTP and the quarterly updates to the LRTP.
3. Periodically, a quiz should be administered to measure the quality of retention regarding safety meeting training topics. A record of any quiz given should be included in each individual's training record along with their quiz results and corrective actions if needed.
4. Data Control:
 - a. Initial general training, periodic training, and upon completion, Qualification Forms are documented and filed in each individual's training record.
 - b. Site Safety Meeting records are filed and retained in the operating record in accordance with procedure ADMIN-3.

TRAIN-1 GENERAL TRAINING REQUIREMENTS

5. Sampling Required: None

6. Audit Requirements:
 - a. Monthly, the Training Officer will review the training records to note any discrepancies and items which need to be completed within the next month.

 - b. Semi-annually, the Site RSO will audit the training records and the records of safety training, noting any discrepancies or areas for improvement.

Procedure For Certification of 11e.(2) Material

Pursuant to License Condition 9.6(c), License No. SMC1559, Envirocare shall obtain certification from the generator or owner of the waste that the waste is 11e.(2) byproduct material. The purpose of this certification is to preclude from disposal in the NRC licensed disposal site all wastes other than 11e.(2) byproduct material.

Envirocare shall follow the following procedure to obtain generator or owner certification:

1. The certification will be substantially in the following form:

[Generator or Owner] hereby certifies that the waste material identified below is 11e.(2) byproduct material, as defined by the Atomic Energy Act, as amended. Specifically, [Generator or Owner] hereby certifies that the waste materials are "...tailings or wastes produced by the extraction or concentration of uranium or thorium from any ore processed primarily for its source material content." This certification is based upon [Generator or Owner]'s documentation of the source or origin of the waste.

[Generator or Owner] hereby certifies that the waste material does not contain any other radioactive waste or hazardous waste.

Exhibit "A" to this certification identifies all hazardous constituents, as listed in 10 CFR Part 40, Appendix A, Criterion 13, and the concentrations of such constituents in the waste, as determined by the independent laboratory identified in Exhibit "A".

This certification is made by a responsible company authority.

Description Of Waste:

Dated this ____ day of ____, 199__.

[Generator or Owner]

Name
Title

January 1994

2. Envirocare will obtain the above certification prior to acceptance of any waste for disposal.
3. Envirocare will use 11e.(2) RSR forms (Figures 16.1 and 16.2 of the License Application) which require certification that each shipment of waste is 11e.(2) byproduct material, is the same as that described in the original certification by the generator or owner, and does not contain other radiological waste or hazardous waste.

RADIOACTIVE WASTE SHIPMENT & 11e.(2) BYPRODUCT MATERIAL

ENVIROCARE OF UTAH, INC. Ph.(801) 46 West Broadway, Suite 240 Fax: (801) Salt Lake City, Utah 84101

(1)
 Generator Name _____
 Address _____

 City _____ State _____ Zip _____
 Contact Person _____
 Phone No. (_____) _____

(2)
 Bill Disposal Charges To _____
 Name _____
 P.O. #/Contract # _____
 Address _____
 City _____ State _____ Zip _____
 Phone No. (_____) _____

(3)
 Agent/Broker _____
 Contact Person _____
 Address _____
 City _____ State _____ Zip _____
 Phone No. (_____) _____

Broker's Signature _____ Date _____

(4)
 Carrier _____ Shipping Date _____
 Carrier EPA # (if any) _____
 Address _____
 City _____ State _____ Zip _____
 Contact Person _____
 Phone No. (_____) _____

Manifest Document Number
 (Hazardous Waste Only)

Type of Container	Container Volume Cu. Ft.	# of Packages	Cu. Ft. Per Container Type
Drums			
Over Pack			
55			
30			
Boxes			
1st Size			
2nd Size			
3rd Size			
Rail Cars			
Truck/Trailer			
Dump			
Trailer			
Other			
Other			
Other			
Shipment			

(5)

TOTAL FOR EACH CLASS		PROPER SHIPPING NAME & HAZARD CLASS (per 49 CFR 172.101)
# of Packages	Weight (Tons)	
		Radioactive Solids, USDOT Exempt
		Radioactive Material - Low Specific Activity - LSA

TERMS AND CONDITIONS

- A. **HAZARDOUS MATERIALS:** Generator represents and warrants that the waste is not a hazardous waste as defined in 40 CFR 261.
- B. **TITLE:** Upon acceptance at the disposal site by Envirocare of Utah, Inc. at the appropriate regulatory authorities, title to the Waste which con representations herein shall thereupon transfer from Generator to Envirocare of Utah, Inc.
- C. **WASTE MATERIAL:** Generator represents and warrants that the Waste is Byproduct Material as defined pursuant to Section 11e.(2) of the Atomic Energy Act, and that it is not any other radiological waste or hazardous waste, and that all discharges comply with applicable regulations and Envirocare of Utah, Inc.'s facility license.
- D. **INDEMNIFICATION:** Generator agrees to indemnify Envirocare of Utah, Inc. for all material respects to the data supplied on the RADIOACTIVE WASTE MANIFEST over such matters.



CHECK ALL THAT APPLY TO THIS LOAD: D

<input type="checkbox"/> Record Waste Description Inadequate. <input type="checkbox"/> Contamination or Leakage Detected. <input type="checkbox"/> Unexpected Exposure Rates Detected. <input type="checkbox"/> Labels, Markings, etc. Inadequate. <input type="checkbox"/> Container Integrity Inadequate. <input type="checkbox"/> Other _____ <input type="checkbox"/> No Violations Detected on this Shipment.	COMMENT _____ SHIPMENT _____ SHIPMENT _____ INSPECT _____
--	--

DISPOSAL RECORD

(7) Page 1 of _____ Record # _____

Use This No. On All
Continuation Pages.

Rail Car/Trailer Number _____

Consigned to: **ENVIROCARE OF UTAH, INC.**, Clive Disposal Site
Interstate 80, Exit 49, West of Salt Lake City, Utah

532-1330
537-7345

(6)

SHIPMENT TOTALS							
Activity in Millicuries							
No. of Containers	Volume Cu Ft	H-3*	C-14*	Tc-99*	I-129*	Th-230	Th-232
				Ra-226	U-Nat		

ANSTEC APERTURE CARD

Also Available On Aperture Card

* Must show 0 if not present. List additional nuclides and activities in blank spaces provided.

THIS IS TO CERTIFY THAT THE HEREIN-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION, AND ARE IN COMPLIANCE WITH ALL REQUIREMENTS APPLICABLE AT THE DESIGNATED DISPOSAL SITE, AND THE REQUIREMENTS OF 10 CFR PART 61 AND PART 20.311 OR EQUIVALENT STATE REGULATIONS. IT IS FURTHER CERTIFIED THAT ALL ITEMS ON THIS RADIOACTIVE WASTE SHIPMENT & DISPOSAL RECORD HAVE BEEN THOROUGHLY EXAMINED, INCLUDING DIAGRAMS, AND ALL INFORMATION SUBMITTED IS TRUE, CORRECT, AND COMPLETE.

that Waste Material

of Utah, Inc. and all forms to Generator's and be vested in

the Waste material is

Authorized Signature of Customer _____ Title _____ Date _____
the Atomic Energy Act, as amended, 42 USCA 2014e.(2), that the waste material is the same as described in Generator's original certification, that the waste does not contain its set forth in this RADIOACTIVE WASTE SHIPMENT & DISPOSAL RECORD are true and correct in all respects and in accordance with all applicable governmental laws, rules,

of Utah, Inc., its officers, employees and agents against all losses and liability whatsoever if such losses or liability results from the failure of the Waste Material to conform in all this SHIPMENT & DISPOSAL RECORD, or if this shipment fails to meet the standards prescribed by the Department of Transportation or any governmental agency having jurisdiction

FOR ENVIROCARE OF UTAH USE ONLY

DESCRIBE INADEQUACIES IN COMMENTS

TS:

RECEIVED FOR DISPOSAL

REJECTED FOR DISPOSAL

OR _____ DATE _____

ENVIROCARE INVOICE #: _____

ENVIROCARE INVOICE DATE: _____

ENVIROCARE CUSTOMER #: _____

DISTRIBUTION:

White, Yellow, Pink - Must accompany waste in transit.

Green-Must be mailed to and be approved by Envirocare of Utah prior to shipment, unless a copy has been sent by fax.

Gold - Customer Copy.

FORM #E 100

January 1994

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