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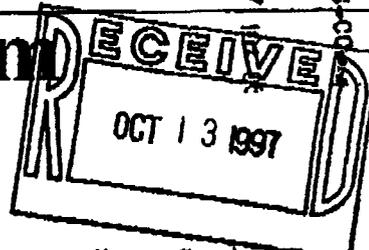
DUE DATE
ACTION

States Government

Memorandum

OCT 9 1997

AME.TAD.DYO.04471



10 OCT 97
REFERS TO

FILE

Department of Energy
Rocky Flats Field Office

Approval of Rocky Mountain Remediation Services Training Implementation Matrix

Alan Parker, Vice President
Closure Projects Integration
Kaiser-Hill Company, L.L.C

Reference Memo Parker to Klein, Subject. "Rocky Mountain Remediation Services Training Implementation Matrix Concurrence," dtd 9/12/97

As requested in the referenced memorandum and in accordance with DOE Order 5480 20A, *Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities*, the Rocky Flats Field Office (RFFO) has reviewed and approves the Rocky Mountain Remediation Services Training Implementation Matrix (TIM), Revision 0. The RFFO expects that an annual review and update to the TIM be performed on this anniversary date or upon change in conditions that would alter the intent of or compliance status of your TIM.

Keith A. Klein
Keith A. Klein
Deputy Manager for Technical Programs

DIST.	LTR	BWS
BACON, R.F.		
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SANDLIN, N.B.		
SPFARS, M.S.		
TILLER, R.E.		
VOORHEIS, G.M.		
<i>Crowe, A.</i>	X	
<i>Overlid, T.</i>	X	
<i>Donato, K.</i>	X	

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Reviewed for Addressee
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10/10/97 *[Signature]*
Date By

Ref Ltr #
97RF04881

DOE ORDER #
5480.204

- cc: D. Lowe, AME, RFFO
- M. Weis, AMPA, RFFO
- J Jeffries, TAD, RFFO
- D Noyes, SPD, RFFO
- S. Crowe, KH
- T Overlid, RMRS



KAISER ♦ HILL
COMPANY

INTEROFFICE MEMORANDUM

DATE September 8, 1997

TO Alan Parker, Sr Vice President Closure Projects, Bldg 111, X4163

FROM  Bonita Patterson, Training & Development, Bldg 060, X8201

SUBJECT RMRS TRAINING IMPLEMENTATION MATRIX (TIM) CONCURRENCE
LBP-038-97

The attached Rocky Mountain Remediation Services (RMRS) Training Implementation Matrix (TIM) describes how RMRS will implement the requirements of Department of Energy (DOE) Order 5480 20A, "Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities" This office has worked closely with RMRS on this effort during the past several months and concurs with the TIM submittal

Please forward these documents to the DOE, Rocky Flats Field Office, Deputy Manager for Technical Programs, Keith Klein for approval, with a courtesy copy to David Lowe, Engineering

If you have any questions, please contact me or Ken Einig at extension 2697

LBP cag

Attachments
As Stated

cc

Kaiser-Hill

S K Crowe w/o Attachments
K W Daniels w/o Attachments
K J Einig w/o Attachments

RMRS

T W Overlid w/o Attachments
W D Reinhart w/o Attachments

DOE ORDER #

97-RF 24381

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MARTINEZ LEN		
OGG BOB		
PARKER ALAN		
TILLER ROBERT		
TUOR NANCY		
VOORHEIS GARY		

Crowe Steve	X	X
Bruse Jill		
Daniels Kevin	X	
McLean Tom		
Miller John		
Wagner Charlie		
Walker Lembke S		
Wirth TJ		
Zimmer Jack		
Hedahl TG		
ZIMMERSON J	X	

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Training
Coordinator
Info.

September 12, 1997

97-RF-04881

Keith A Klein
Deputy Manager for Technical Programs
DOE, RFFO

RMRS TRAINING IMPLEMENTATION MATRIX (TIM) CONCURRENCE - AMP-138-97

Ref L B Patterson ltr, LBP-038-97, RMRS Training Implementation Matrix (TIM)
Concurrence, September 8, 1997

The purpose of this letter is to formally transmit the revised RMRS TIM for DOE Rocky Flats
Field Office (RFFO) approval. The referenced letter provided Kaiser-Hill (K-H) Training and
Development concurrence in the RMRS TIM. K-H Closure Projects has reviewed the TIM and
concurs with its content.

If you have any questions on this matter, please contact Kevin Daniels at Extension 5844
digital page 1497

Alan M Parker
Vice President
Closure Projects Integration
Kaiser-Hill Company, L L C

KWD rwa

Attachment
As Stated

CC
D Lowe

ITEM STATUS
PARTIAL/OPEN
 CLOSED
LTR APPROVALS

DATE & TYPIST INITIALS
rwa

Kaiser Hill Company, L L C
Counter Address Rocky Flats Environmental Technology Site, State Hwy 93 and Cactus, Rocky Flats, CO 80407
Mailing Address P.O. Box 464, Golden, Colorado 80402-0464



TRAINING IMPLEMENTATION MATRIX

REVISION # 0

August 28, 1997

Reviewed by

W Douglas Reinhart 8.29.97
W Douglas Reinhart, Manager/Compliance Training Date

Approved by

Terrence W Overlid 9/4/97
Terrence W Overlid, Director/Program Compliance Date

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CONTROLLED DOCUMENT (6)

HOCKY FLATS PLANT

ENVIRONMENTAL MANAGEMENT DEPARTMENT

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1 COPY # 35

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I. INTRODUCTION

A. PURPOSE

The Training Implementation Matrix (TIM) describes how Rocky Mountain Remediation Services (RMRS) implements the requirements of Department of Energy (DOE) Order 5480 20A, "Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities," hereinafter "the Order", for RMRS nuclear facilities at the Rocky Flats Environmental Technology Site (the Site). The TIM describes the organization and administration of the training and qualification programs which meet the requirements of the Order, and sets forth responsibilities and authority for conducting training. Requirements of the Order are addressed for each applicable RMRS nuclear facility and references are provided to Site, Company and facility-specific training and qualification documentation which describe how compliance is achieved.

Appendices to this Narrative identify RMRS nuclear facilities that comply with the Order and provide facility-specific documentation in which Order compliance status, training and qualification information and any exceptions to Order requirement are described. Changes to this TIM that do not fundamentally alter the principles and methods by which compliance with the Order is achieved will be accumulated and submitted annually to DOE RFFO for concurrence and approval. Changes may be made to fundamentally alter how compliance with the Order is achieved in facility-specific training and qualification programs as the magnitude of hazards, the mission, the characteristics, etc. of a particular facility change. These fundamental changes will be recorded in the RMRS TIM and submitted for DOE approval before they are implemented.

B. ORGANIZATION OF THE TRAINING IMPLEMENTATION MATRIX

The TIM consists of this narrative and appendices which identify the RMRS nuclear facilities and demonstrate compliance with the Order on a facility-specific basis. This narrative describes RMRS' assessment of its nuclear facilities at the Site and provides the justification for which facilities must be included in the RMRS TIM. Also, the narrative presents the organization and responsibilities of the RMRS training and qualification (T&Q) program, and describes the functional levels and position descriptions within RMRS operating organizations who are in responsible roles for control of nuclear facility hazards in the applicable nuclear facilities. Appendix 1 is a table that lists RMRS nuclear facilities and the status of their training and qualification requirements documentation. Appendix 2 contains sections that describe the operations at each facility, the facility's staffing plan for control of nuclear hazards, and qualification requirements for position titles at each applicable functional level. Appendix 3 is also facility-specific and gives a detailed accounting of specific DOE Order requirements and responses and reference documentation which achieve compliance with these requirements for the facility. Any exceptions taken to requirements and additional T&Q documentation in preparation are also listed on Appendix 3.

II. APPLICABLE FACILITIES

Each RMRS nuclear facility has been initially evaluated for T&Q needs and requirements by review of the authorization basis (AB) for the facility. This included a review for T&Q impacts by the facility mission, identified nuclear and other health and safety hazards, nuclear hazard category rationale, engineered safety features (ESF) and other means to mitigate the potential exposure of workers and the public, scope of RMRS authority, emergency procedures, and other work activities within that facility that rely on correct work execution to be safely completed. The description recorded in the training program documentation, including the facility-specific TIM appendices and/or Training Implementation Plan (TIP), is sufficiently detailed to convey the rationale used in establishing the facility T&Q requirements.

Nuclear facilities for which RMRS currently has operating responsibility, and those which will be turned over to RMRS for decommissioning purposes in accordance with the Site 10-Year Plan, are recognized to present moderate to very low nuclear health and safety hazards to workers, the Site and the general public. DOE Order compliance is addressed for T&Q programs at all RMRS Category 2 nuclear safety hazard facilities, as well as those RMRS Category 3 facilities that utilize ESFs per the DOE Order. Previously, ESFs were identified as vital safety systems in the facility AB documents, the Safety Analysis Report, Basis for Final Operations, or the Basis for Interim Operations documents. Appendix 1 of the TIM provides a listing of TIM applicable RMRS facilities, their designated nuclear hazard Category, and ESF reliance status. Currently, the Site has identified several RMRS nuclear facilities as Category 2 with moderate to low nuclear safety concerns, some of these do not rely upon any ESF, but are included in the TIM to address DOE Order applicability and exceptions. Four of the facilities listed on Appendix 1 are waste management buildings which RMRS manages. The other two are Buildings 374 and 774, where RMRS manages water treatment operations but Safe Sites of Colorado (SSOC) manages the buildings and controls the building ESFs. At Buildings 374 and 774, RMRS provides supplemental TIM Appendix 2 and 3 information on the RMRS operating organizations' training and qualification programs to SSOC. Appendix 1 also indicates that RMRS does not currently have any Category 3 nuclear facilities with ESF. The T&Q concerns for these facilities are addressed solely by the facility-specific TIP. This approach implements cost effective controls in a graded manner based on the relative nuclear safety hazard, as encouraged by the DOE Order.

The graded methodology for development of specific T&Q requirements in the various facilities, projects and programs is described in the RMRS Training Manual (RTM). Updating of the AB for a facility is a basis for revision of T&Q requirements in the TIM appendices and TIP for that facility. Pursuant to the RTM, facility management is responsible for analysis of T&Q needs when an AB update authorizes new work scope which necessitates changes in functions and duties of operating organization personnel.

An annual drill simulating credible emergency conditions is part of the training program for each nuclear facility, in accordance with the DOE Training Order (5480 20A) and DOE Order 5500 3A, *Planning and Preparedness for Operational Emergencies*. Drill planning and procedures are based on the Site Emergency Plan and the Site Building Emergency Preparedness Programs Manual. RMRS operating organizations in the Operations Division implement these requirements through a drill progression program, with review by the Program Compliance group.

Deactivation and decommissioning activities at the Site will bring about a transfer of facility ownership from Safe Sites of Colorado (SSOC) to RMRS, building by building. Review and modification of the SSOC AB and, subsequently, the facility TIM and TIP, will occur in coordination with facility transfer. In cases where the facility mission changes such that it no longer requires TIM Appendices 2 and 3, the analysis and justification for doing so will be documented in a revision of Appendix 1 and will be submitted for DOE approval.

III. SITE ORGANIZATION

A OPERATING ORGANIZATION

RMRS is one of the prime contractors at the Site. RMRS has responsibility for environmental restoration (ER), waste management/minimization (WM), and engineering, construction and decommissioning (ECD) activities at the Site. Kaiser-Hill, LLC is the integrating management contractor (IMC) and has primary responsibility for oversight and integration of all site activities. The other prime contractors have responsibility for major site activities as follows:

<u>Company</u>	<u>Areas of Responsibility</u>
DynCorp of Colorado (DCI)	Maintenance, property management, utilities
Safe Sites of Colorado (SSOC)	Risk reduction operations, special nuclear material consolidation, liquid stabilization, residue processing, and deactivation
Wackenhut (WSLLC)	Security, safeguards of special nuclear material

Most of the Site operating nuclear facility management within RMRS jurisdiction currently resides in the WM organization, including the nuclear waste treatment, storage, and shipment facilities. Work is currently performed by the ECD organization within certain Category 2 or 3 nuclear facilities, and ECD nuclear facility management occurs for those buildings in transition for decommissioning. The Water Management and Treatment Group within the ER organization performs nuclear waste processing in Buildings 374 and 774, facility management and control of building ESFs are responsibilities maintained by Safe Sites of Colorado. ER Projects currently do not perform nuclear work beyond the category of "Radiological Facility", which falls outside the jurisdiction of the TIM. There are several support organizations which facilitate RMRS' performance of these three operating organizations, including finance, human resources, safety, quality, regulatory compliance, and training.

The primary functional levels defined in the DOE Order and staffed in nuclear facilities by RMRS are Managers, Supervision, Operators, Technical Support, Technicians, and Maintenance. Each organization maintains its own sub-

organizations and lower level position titles which are listed in the respective facility TIP, and TIM appendices, if applicable

The RMRS nuclear facility operating organizations do not clearly match with the Order-driven functional levels, which directly apply to facilities in production. This is particularly true for RMRS waste package handler personnel, necessitating interpretation of which functional level in the Order best fits their work scope. The two functional levels of "Operator" and "Technician" were scrutinized for placement of waste package handlers. RMRS devised a system for placement of waste package handlers in either of these two functional levels by 1) assessing the specific activities of waste package handlers and their associated hazards in terms of potential for radioactive release or nuclear criticality, and 2) reviewing how operating organizations have been configured at other operating nuclear facilities in the DOE Weapons Complex which handle radioactive waste.

Based upon their current work scope, waste package handlers in RMRS nuclear facilities are classified as Technicians. They handle only solid waste forms in sealed packages. They do not handle residues or other forms of fissile material, nor liquids or other non-solid waste forms. The tasks they perform include movement of waste containers using fork trucks and hand-operated drum dollies and non-destructive assay and testing of waste in the sealed containers. They also prepare waste package lots for shipment by stabilizing drums against movement on pallets and staging the lots for pickup at loading points. In addition, the waste package handlers perform the storage area surveillance which is covered by a Site-wide qualification for conducting nuclear material safety limit surveillances (NMSL/CSOL Surveillances, Course ID #016-770-01) in some of the facilities. The waste package handlers do not open waste packages, but in some buildings they perform overpacking tasks on the containerized waste. They do not participate in spill response in the event of an accident which may cause breach of containers in their work areas.

The assessment of potential activities in RMRS waste management facilities yielded a set of threshold tasks and responsibilities that exceed current waste package handler work scope and may move them from the Technician to Operator functional level in RMRS nuclear facilities^a. These threshold types of activity were identified by reference to the Operator functional level duties listed in Chapter IV, Section 2c, of the Order: operation of ESFs or related support systems, and conducting activities with radioactive materials. RMRS interprets the latter to mean direct handling as opposed to waste package handling, since direct handling of waste may involve the heightened risks of radioactive release that would warrant training and qualification at the Operator classification. The handling of packaged waste involves more limited hazards similar to those in commercial or industrial waste management. Therefore, RMRS waste package handlers train and qualify at the Technician classification. As required by the RTM, facility management will analyze planned changes in waste handler work scope and assess the need for re-assignment to an Operator classification with the aid of the RMRS Training Group.

The classification and training and qualification requirements under the DOE Order were reviewed for waste handlers in nuclear facility operating organizations at three other DOE Weapons Complex facilities^a. This review indicated that the RMRS

^a Reference RMRS Training Group Memorandum, WDR-108-97 Functional Level Classification for Waste Package Handling Personnel in Waste Management Facilities (Draft), issue September, 1997

practice of placing waste package handlers in the Technician functional level is at least as restrictive in terms of applying Order requirements as the other three Sites. At one of the other facilities, waste handlers are classified as Technicians, while at the other two waste handlers are not even included in the nuclear facility operating organizations. The RMRS approach promotes nuclear safety in waste management operations and results in training and qualification program requirements for waste handlers that equal or exceed requirements at the other sites.

Workers supporting activities at RMRS nuclear facilities will be drawn from the following worker classification groups, taken from DOE Order 5480 20A:

- Managers

The term "Manager" refers to a person whose assigned responsibilities include ensuring that a nuclear facility is safely and reliably operated, and that supporting operational and administrative activities are properly controlled. Managers are authorized to perform their duties by an officer of the company per Chapter IV of the DOE Order. Managers are responsible for nuclear safety, operational efficiency and reliability, control of onsite emergencies, and any other activities necessary to safeguard the health and safety of the workforce, the general public, and the environment. Operational responsibilities include prioritizing and assessing facility activities, including modifications, overseeing the operating organization, and serving as the qualification authority. Administrative responsibilities include maintenance of a qualified staff, budgets, maintaining employee performance, administering disciplinary actions consistent with company policies, public information, and coordination with senior management. This RMRS functional level includes, for example Facility Manager, Deputy Facility Manager, Team Lead (for water treatment operations) and Project Manager. Team Leads are assigned in facilities where RMRS conducts routine operations or projects but where RMRS does not have overall facility management and ESF control responsibility.

- Supervision

This functional level consists of those individuals who are responsible for the quantity and quality of work performed and who direct the actions of operators, technicians, or maintenance personnel. Their duties include ensuring that work is performed in compliance with procedures, policies, and industrial safety practices. This RMRS functional level includes, for example Building Manager and Foremen. The Building Manager can also serve as the qualification authority unless he is the immediate supervisor of the person qualifying.

- Operators

Operators are persons responsible for performing operations associated with engineered safety features as identified in the given AB document, operating support systems which could affect engineered safety features, or handling significant quantities of fissionable materials. Duties may include manipulating facility controls, monitoring parameters, and operating equipment in ESFs. Other Operator positions have duties involved in the treatment and stabilization of radioactive liquid wastes. Note that handling of packaged solid waste forms and materials normally will not require operators unless waste repackaging is involved. This RMRS functional level

includes, for example Operations Foreman, Stationary Operating Engineer (SOE), and certain Process Specialist positions in the Water Management and Treatment operations

- Technical Support

Personnel in these positions are responsible for supervision and performance of technical support functions for the operating organization. Personnel involved in surveillance, testing, analyzing facility data, planning modifications, program review, and technical problem resolution in their area of expertise are also included. They may have expertise in mechanical, electrical, instrumentation and control, chemistry, radiation protection, safety, or quality assurance/ independent assessment. This RMRS functional level includes, for example Assay Equipment Engineer, Engineering Technologist, Criticality Safety Officer

- Technicians

Technicians are principally involved in calibration, inspection, troubleshooting, testing, maintenance, packaged waste and drum handling, and radiation protection activities at the facility. This RMRS functional level includes, for example Technical Supervisor, Waste Technologist, Waste Inspector, Process Specialists and Mission Support Specialists involved in waste package handling and Radiological Control Technician (RCT). The inclusion of waste package handling personnel in the Technician functional level is described further below.

RMRS classifies personnel who handle solid radioactive waste only in sealed or drummed packages as Technicians pursuant to the Order because these personnel do not handle the material in a way that introduces the types of nuclear safety risks contemplated in the Order associated with personnel in the Operator functional level. The position descriptions of personnel assigned to waste package handling tasks are

- Waste Technologist or Mission Support Specialist (outside the PA)
- Process Specialist (inside the PA)

The duties of RMRS waste handlers who only handle packaged waste in the RMRS nuclear facilities are clearly and narrowly defined in facility mission statements, AB documentation and implementing work procedures. Qualification of waste handling Technicians occurs at two levels. First, these personnel may be qualified with neither a formal qualification document (QD) nor formal requalification program when they perform routine waste package handling and movement activities and storage area surveillances. For these routine, very low-risk tasks, they receive standard Site and facility access training and achieve Site-wide, non-Order driven qualifications (e.g., fork truck certification and Waste Generator qualification). Where more complex, specialized, low-risk tasks are performed (e.g., non-destructive assay equipment operation), the waste handling Technician receives one or more additional, formal, procedure-based qualifications (QDs), while formal requalification is not required. For waste handling Technicians at both qualification levels, qualification is maintained by participation in the facility continuing training program and documented satisfactory performance of duties.

Threshold activities which may necessitate re-classification of waste package handlers as Operators, include

- 1) Open packages to expose contents for uncontained waste removal or inspection,
- 2) Conduct waste repackaging tasks beyond overpacking,
- 3) Directly handle the material in any processing system which alters the physical, chemical, metallurgical or nuclear properties of the wastes,
- 4) Operate equipment which is used to produce, process, transfer or store non-containerized materials,
- 5) Have involvement in emergency response activities in the event of a spill or leak of radioactive materials,
- 6) Have involvement in control manipulation of ESFs, or
- 7) Conduct activities with nuclear safety hazard consequences that warrant the establishment of ESFs

Relative to item 4 above, the waste package handlers do operate fork trucks and manual equipment for movement of packages, however these are standard in industrial operations, involve only sealed packages and drums, and do not alter the configuration of the materials in the packages in any way meaningful to nuclear safety. Operator duties pursuant to the Order emphasize processing operations that alter the nuclear material form, configuration and quantity, control manipulations such as those performed in a reactor control room, or robotic operations, and supplied air manual operations for non-reactor material handling. The activities of waste package handlers do not constitute that type of duty. Waste handling Technicians who will be re-assigned to tasks that do involve Operator functions and duties of processing and control manipulations receive additional training and qualification commensurate with the new job and task analysis (JTA) performed for those tasks. Their re-assignment will be handled as a fundamental change to the operating organization for the associated facility as discussed in Section I A above.

- Maintenance

Maintenance personnel are responsible for the maintenance and repair of mechanical and electrical equipment in RMRS facilities. In some nuclear facilities, these personnel perform work which may affect ESF equipment and systems. Maintenance level includes, for example, Maintenance Technologist and System Engineer.

B RMRS TRAINING GROUP

The RMRS Training (RT) Group has a centralized, matrixed organizational structure to best administer programmatic requirements, deliver training services to the RMRS operating organizations, and ensure adequate control of active T&Q records. The RT Group reports through the Director of Program Compliance to the Vice President of Operations, giving it a close tie to the operating organizations it serves. The RT Group consists of a program unit, which maintains company training programs and documentation, and establishes systems for complying with DOE Order T&Q requirements, and, the matrixed field support units, which 1) provide tracking and scheduling of the T&Q elements that operating personnel need to maintain work area access and task authorization, and 2) develop and deliver job-specific training packages for qualification to perform building and project specific tasks.

The RT Group maintains the RMRS Training Manual (RTM) and assists the line organization with its implementation. RT ensures that technical training uses the

systematic approach to training (performance-based) and that on-the-job training is performed by qualified individuals RT works with the responsible operating organizations to assure that appropriate TIMs, TIPs and qualification documents are prepared based on JTA, reviewed and approved, and that appropriate records are maintained

RT evaluates and documents that technical training provided by vendors and subcontractors outside of RMRS meets the appropriate training performance objectives RT arranges for specialized classes where classes are not available at the Site

- Training Manager

The RMRS Training Manager is responsible for the RTM and for reviewing and concurring on changes to TIM appendices, qualification documents, and work instructions relating to T&Q With regard to the TIM appendices and other facility dependent training documents, the Training Manager works with the nuclear facility management to tailor these items to the specific conditions and work scopes in the facilities The Training Manager also establishes the company training records system and interfaces with the customer training group and other training companies at the Site

In addition, the Training Manager

- Ensures that RMRS training programs meet the requirements of the DOE Order,
- Assists in updating job analysis data as current position, procedures, permits, hazards, or facility changes occur,
- Assists in the development of training materials for classes provided by RMRS,
- Reviews the training materials prepared by RMRS organizations for nuclear facility on-the-job training (OJT),
- Ensures that training personnel meet the minimum requirements for their T&Q responsibilities, and
- Ensures that instructors are qualified and assessed annually

Training Coordinators (TCs) are matrixed field support personnel responsible for scheduling of training and record keeping for the managers, organizations, or projects to which they are assigned The TCs assist the Training Manager and facility management (operating organizations) in preparing applicable TIMs and TIPs, and have other duties and responsibilities as described in the RTM

Instructor/Developers are also matrixed field support personnel and are responsible for facilitating job and task analyses, preparing and obtaining training materials, instruction of personnel in the operating organizations and administering qualification program elements including oral examinations to candidates for qualification Other duties of these support personnel are described in the RTM

Program and field support training personnel maintain qualification on relevant subject matter as established by the Training Manager

C OUTSIDE TRAINING SUPPORT

Training support activities may be provided to RMRS by various site or subcontracted companies. Regardless of who provides the training or prepares the training work instructions, TIMs, TIPs, or qualification documents, all training activities performed in support of RMRS nuclear facility work shall meet the intent of the DOE Order, the requirements of the RMRS RTM, and applicable portions of the Site TUM. The Contract Technical Representative shall understand these requirements, ensure they are incorporated within the Statement of Work, and are followed during work performance. Companies who deviate from these requirements will be removed from the list of companies available to provide training support to RMRS.

D SUBCONTRACTOR PERSONNEL

RMRS subcontractor personnel who perform operational activities at a nuclear facility shall be trained and, in some instances, formally qualified to perform that activity. The Facility Manager, with assistance from the Contractor Technical Representative (CTR), is responsible to ensure that subcontractor personnel are trained and qualified to perform their assigned tasks. When necessary, subcontractor personnel shall be considered adequately qualified with proper documentation of at least one of the following:

- 1 The satisfactory result of an audit of subcontractor records which relate to qualification of the subcontractor personnel being considered for assignment by the operating organization, or
- 2 The operating organization's previous verification (within 2 years) of the ability of the subcontractor employee to perform assigned tasks safely and efficiently, or
- 3 Successful completion by the subcontractor employee of those segments of the operating organization's qualification program which are considered pertinent to accomplishment of the task to be performed.

For subcontractor personnel who do not meet the specified requirements, work activities on safety systems as identified in the facility AB documents shall be supervised by a person who meets the qualification criteria established by the operating organization for conduct of the activities.

IV QUALIFICATION PROGRAM DESCRIPTION

A PLANNING OF T&Q PROGRAMS

The qualification requirements listed for the range of functional levels and position descriptions in each facility-specific TIM Appendix 2 are detailed as to the specific training elements and the makeup of the qualification document (QD) through training needs assessment and job and task analysis (JTA). These processes are conducted using TUM guidance, the RTM and supporting administrative work instructions.

The "qualification document" is the general term for documentation which establishes the adequacy of training for nuclear facility personnel. The QD can include a qualification form, qualification standard package (QSP) and procedure qualification package (PQP). The makeup of the qualification document ranges in detail and content for the different functional levels and personnel positions, also as described in the RTM and work instructions. The listings of types and content of training courses and necessary theoretical knowledge verification, facility walkthroughs, performance demonstrations, on-the-job training and just-in-time training, are in the Training Implementation Plan (TIP) for each facility, which is also prepared in accordance with the RTM and work instructions.

B QUALIFICATION REQUIREMENTS FOR OPERATING ORGANIZATION PERSONNEL

Qualification requirements for operating organization personnel vary based on their functional level, duties and tasks, pursuant to requirements in the DOE Order.

- QD for Manager positions may use the qualification form for approval of qualification by listing and referencing facility specific experience and knowledge, and summarizing training elements required and completed. The Facility Manager and operations Team Lead receive line management endorsement of their ability to control nuclear safety and health hazards in the facility or operating area, which may be used lieu of a QD. Formal requalification may not be required for Managers unless deficiencies are identified in facility management for control of nuclear hazards. Satisfactory performance of assigned duties and assessment of individual performance such as that which is included in personal performance appraisals may be used to document continued satisfactory performance.
- Operator QD utilizes the QSP or PQP documentation approaches, to address the ESF manipulations and/or fissionable material handling which occurs. The SOE and Process Specialist positions may be moved down to the Technician functional level when ESF are not present and fissionable material handling (other than in waste packages) does not occur. Operators are subject to requalification requirements and may have to be certified for certain higher hazard tasks and evolutions, although no such conditions have been identified to date in RMRS operating organizations' work scopes. Immediate Supervisors of Operators are required to meet a greater depth of QD requirements compared to the personnel they supervise, in addition to demonstrating supervisory skills.
- Technicians and Maintenance personnel QD may include PQPs (e.g., for Waste Technologists), or formal QD may be omitted, based on the outcome of JTA. Technician and Maintenance personnel who work on ESFs are required to complete performance demonstrations to satisfy requirements for qualification in accordance with the Order. Formal requalification may not be required for Technicians and Maintenance personnel unless deficiencies are identified in their discharge of duties related to ESFs and nuclear hazards. Their documented satisfactory performance of assigned duties and their participation in the continuing training program serves as sufficient evidence of maintenance of their qualification.
- Technical Staff personnel listed for compliance with Order qualification requirements are those who have the potential to affect the facility safety envelope. QD for Technical Staff utilizes a qualification form, QSP or PQP.

depending on the duties the personnel discharge in relation to nuclear safety hazards. Formal requalification may not be required for Technical Staff personnel unless deficiencies are identified in their discharge of duties related to ESFs and nuclear hazards. Their continued satisfactory performance of assigned duties and their participation in the continuing training program serve as sufficient evidence of maintenance of their qualification.

C LIST OF QUALIFIED INDIVIDUALS (LOQI)

Development and use of a List of Qualified Individuals (LOQI) for maintaining a qualified workforce in each nuclear facility is required in the RTM, the individual facility TIP, and associated work instructions. RMRS is specifically responsible for the training and qualification of its operating and support organizations and training department personnel in accordance with the Order, as well as RMRS subcontractors. Placement of personnel on the LOQI and maintaining the LOQI with monthly updates are responsibilities of the RMRS Facility Manager or Team Lead, and of responsible managers of support organizations which supply personnel to nuclear facilities. The Facility Manager maintains copies of and reviews the LOQI's for positions identified in the TIM for that nuclear facility. The responsible manager for RMRS personnel performing work in non-RMRS facilities supply LOQI information to other Site contractor facility managers for assigned personnel. Non-RMRS contractors and their subcontractors are responsible for the training and qualification of their personnel working in RMRS-controlled duty areas. The RMRS Facility Manager or Team Lead requests LOQI information from management for non-RMRS personnel assigned for work at RMRS facilities.

APPENDIX 1

**TRAINING IMPLEMENTATION MATRIX STATUS
 CATEGORY 2 NUCLEAR FACILITIES ¹**

Rocky Mountain Remediation Services, LLC

Cluster/ Bldg. #	Facility Name	Engineered Safety Features	AB Document Date ²	TIM Appen. Date ³
374 ⁴	Water Treatment Operation	Yes	FSAR, 6/87	8/28/97 (F)
440	Waste Storage/Shipping & Low Level Waste Repackaging	No	BFO, 12/6/96	8/28/97 (F)
569	Crate Counter/Waste Storage	No	BIO, 5/15/97	8/28/97 (F)
664	Waste Storage/Shipping & WIPP Packaging	No	FSAR, 12/96, Rev 3	8/28/97 (F)
774 ⁴	Water Treatment Operation	Yes	FSAR, 6/87	8/28/97 (F)
991	Product Warehouse & Waste Storage	Yes	DSAR, 1981, OSR, 4/88	8/28/97 (F)

¹ RMRS has no Category 3 Nuclear Facilities with ESFs

² AB documentation listed was reviewed to identify ESFs in the RMRS nuclear facilities

³ Date of issuance of facility-specific TIM Appendices 2 and 3, D = Draft, F = Final, A = Approved by DOE/Rocky Flats Field Office

⁴ Safe Sites of Colorado (SSOC) manages these facilities and controls ESFs, RMRS TIM Appendices cover the water treatment operations only and are provided to SSOC for incorporation into the SSOC TIM