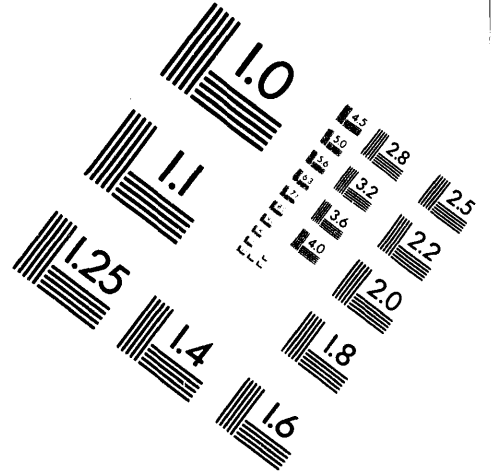
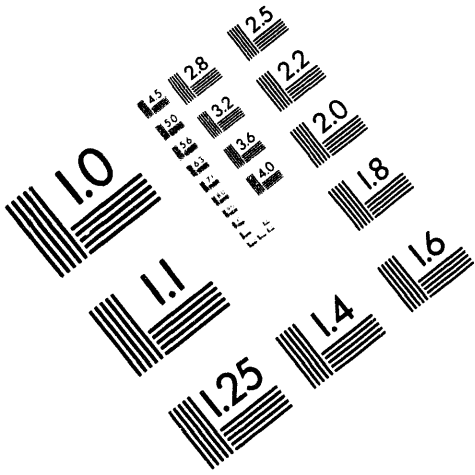




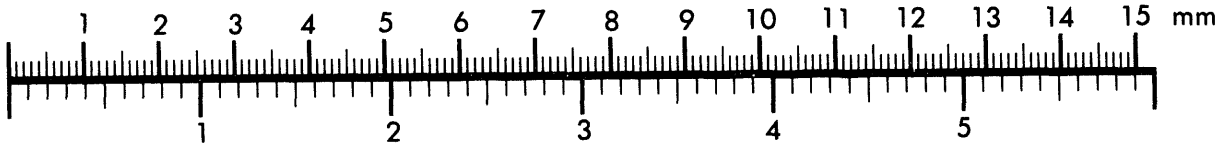
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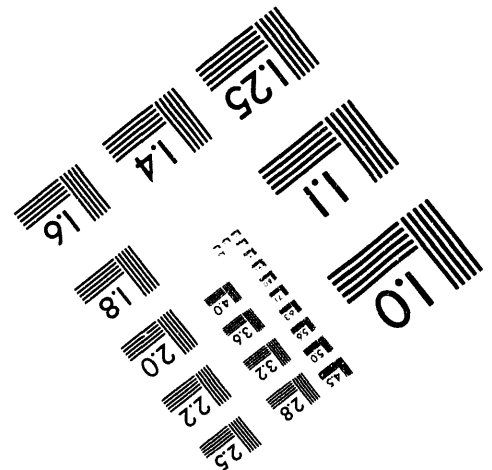
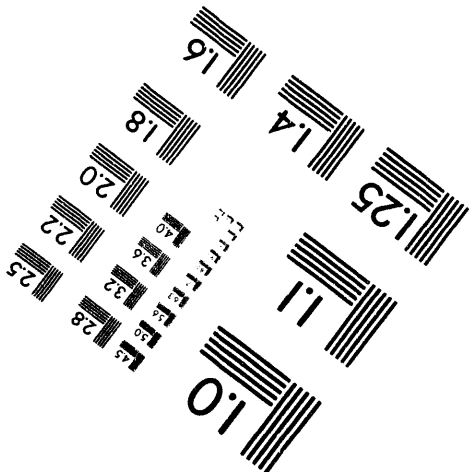
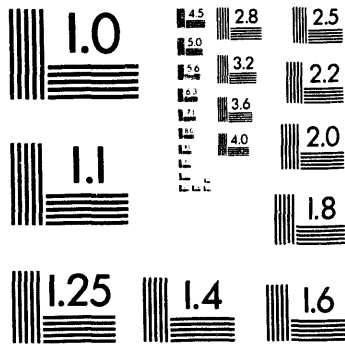
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1 of 1

Training Assessments and Assistance

Prepared for the U.S. Department of Energy
Office of Environmental Restoration and
Waste Management



Westinghouse
Hanford Company Richland, Washington

Hanford Operations and Engineering Contractor for the
U.S. Department of Energy under Contract DE-AC06-87RL10930

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TRAINING ASSESSMENTS AND ASSISTANCE
TRANSPORTATION MANAGEMENT WORKSHOP

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SUMMARY

The Transportation Management Division, Office of Environmental Restoration and Waste Management (TMD/EM-261), United States Department of Energy (DOE), Training Program Manager has established an independent Training Assessment Program, the intent of which is to evaluate, exclusively, transportation and packaging training activities throughout the Department of Energy (DOE) community.

The results generated from an application of the Training Assessment Program are intended to be utilized as a management tool for maintaining compliance with applicable regulatory-driven training requirements. In addition, the Transportation Assessment Program can be employed to evaluate training methodologies and, through a pre-arranged, cooperative, technical assistance effort, provide each Department of Energy (DOE) site with the means necessary to enhance its overall transportation and packaging training capabilities.

I. INTRODUCTION

The Training Assessment Program provides a standardized, systematic approach to the execution of technical training assessment activities based upon documented criteria, procedures, and requirements, in accordance with applicable Federal Regulations, Department of Energy (DOE) Orders and Directives, and accepted best management practices.

The Transportation Assessment Program encourages the Department of Energy (DOE) facility that is the subject of the assessment to take advantage of cooperative, technical assistance to correct identified areas of concern. This technical assistance is coordinated, on a cost-reimbursement basis, through the Transportation Management Division, Office of Environmental Restoration and Waste Management (TMD/EM-261), Training Program Manager.

II. BACKGROUND

The Transportation Management Division, Office of Environmental Restoration and Waste Management (TMD/EM-261), United States Department of Energy (DOE), Training Program Manager contracted with Westinghouse Hanford Company (WHC), Transportation Programs and Training, to develop and administer an independent Training Assessment Program.

The Training Assessment Program is an activity wholly independent from the Transportation Management Division, Office of Environmental Restoration and Waste Management (TMD/EM-261), United States Department of Energy (DOE) sponsored Transportation Compliance Assessment and Assistance Program (TCAAP) inasmuch that only mandated transportation and packaging training requirements are addressed.

III. DESCRIPTION

The Training Assessment Program consists of the enabling Management Plan, the Transportation Management Division (TMD) Training Assessment Standard Operating Procedure (SOP), and Assessment Criteria that are approved by the Transportation Management Division (TMD) Training Program Manager for use during training assessment activities.

The Training Assessment Program is implemented through the use of the Management Plan, the Standard Operating Procedure (SOP), Assessment Criteria, and an annual schedule.

A. Assessment Personnel

A roster of qualified, training assessment personnel is maintained by the Training Program Manager. The selection of individuals to serve as training assessment personnel is based upon training and experience commensurate with the scope and complexity of the operation, activity, or organization of the Department of Energy (DOE) site being assessed.

1. Minimum training assessment personnel qualifications.

Training assessment personnel must not have any direct accountability for the performance of the training activities to be evaluated.

All training assessment personnel must meet Transportation Management Division (TMD) sanctioned training and experience requirements (a minimum of five (5) years of direct United States Department of Transportation (DOT) regulatory compliance experience).

Individuals identified as Lead Auditors must complete formal training programs and maintain current certification as such.

Additional qualifications may be required for specific transportation training-related issues as determined by the Training Program Manager.

B. Assessment Criteria

The Training Assessment Program utilizes the applicable Federal Regulations, Department of Energy (DOE) Orders and Directives, and accepted best management practices as the basis for the standardized, performance-objective criteria, as indicated below:

1. Code of Federal Regulations (CFR), Title 49, Part 172, Subpart H - "Training" contains the training requirements for hazardous materials employers and employees. Code of Federal Regulations (CFR), Title 49, Part 172, Subpart H - "Training" also references specific modal training requirements located in Code of Federal Regulations (CFR), Title 49, Part 177 - "Carriage By Public Highway", which in turn references training requirements found in Code of Federal Regulations (CFR), Title 49, Part 390 - "Federal Motor Carrier Safety Regulations" (FMCSR).

2. Department of Energy (DOE) Order 1540.1A "Materials Transportation and Traffic Management" contains the statement "DOE shipments shall comply with all laws and regulations notwithstanding the Department's national security exemption..." (173.7(b)).

3. Department of Energy (DOE) Order 5480.3 "Safety Requirements for the Packaging and Transportation of Hazardous Materials, Hazardous Substances, and Hazardous Waste" contains the statement "When offered to the carrier, each shipment of hazardous materials, hazardous substances, and hazardous wastes shall be in compliance with this Order and the applicable safety regulations of the Department of Transportation, and follow the applicable packaging standards of the Nuclear Regulatory Commission (10 CFR 71).".

4. Department of Energy (DOE) Order 5700.6C "Quality Assurance", "Management Criterion 2 -- Personnel Training and Qualification" contains the statements "Personnel shall be trained and qualified to ensure they are capable of performing their assigned work. Personnel shall be provided continuing training to ensure that job proficiency is maintained."

C. Training Assessment Program Schedule

1. An annual assessment schedule is developed by the Training Program Manager to determine when, where, and how many Training Assessment Program activities will be initiated during each fiscal year.

2. The Training Program Manager will make the determination to include a particular Department of Energy (DOE) facility on a activity schedule based upon the following pre-determined criteria:

a. High visibility concerns associated with transportation and packaging activities that could cause adverse safety conditions, or conditions of non-compliance with regulatory or policy requirements.

b. Stakeholder concerns that require evaluation of transportation and packaging training activities conducted at a specific Department of Energy (DOE) site (e.g. congressional inquiries, tribal concerns, state and local area inquiries)

c. Previous findings or unresolved issues from transportation related Department of Energy (DOE) site assessments or appraisals (e.g. Tiger Teams, Safety and Health Technical Safety Appraisals, contractor self-assessments, field element appraisals, etc.)

d. Initiation of unique shipment campaigns that invoke high levels of institutional concerns, where additional training or verification of training is desired.

e. Volume of inbound and out bound shipments to or from a given Department of Energy (DOE) facility; unique missions or utilization of unique transportation or packaging systems.

f. Frequency of participation in Transportation Management Division (TMD) sponsored assessments or appraisals.

D. Standard Operating Procedure

The Transportation Management Division (TMD) Training Assessment Standard Operating Procedure (SOP) specifies a consistent approach for planning, conducting, documenting, reporting, follow-up and closeout of assessment activities.

E. Reporting Method

The Final Report is the official end product of the Training Assessment Program. The Final Report consists of the following seven (7) components:

1. The Executive Summary: a concise description of the scope of work and results of the Training Assessment Program activity that was performed.

2. The Introduction: a detailed description of the assessment activities based on the pre-determined scope of work and time frame for assessment completion.

3. The Significant Safety and Regulatory Concerns: a compilation of transportation and packaging training related issues and concerns that are determined to be in an unsafe or regulatory non-compliant condition.

These concerns are ranked in the following order:

a. Level 1 - imminent safety hazards to employees, the public, property, or the environment.

b. Level 2 - an overall assessment of Department of Energy (DOE) site regulatory and policy compliance status with regard to training due to a lack of management system controls.

c. Level 3 - violations of Federal Regulations, Department of Energy (DOE) Orders, or other applicable regulatory and policy requirements. (Applicable to each Level 2 overall concern.)

4. The Best Management Practice Component: concerns that, if improved, would result in more efficient training activities.

These concerns are ranked in the following order:

a. Level 4 - an overall assessment of the training activity or status of the training program with regard to failure to implement best management practices.

b. Level 5 - significant deviations from industry standards that impact cost or mission.

5. The Outstanding Performance Component: identifies implementation of training related activities that clearly meet or exceed established regulatory requirements, policy requirements, transportation and packaging industry standards; successes in the areas of cost savings, mission and milestone achievement, and external community, state, and tribal relations.

6. Appendix A: miscellaneous support information and regulatory excerpts.

7. Appendix B: Training Assessment Program personnel biographical information, Training Assessment Program schedule, Department of Energy (DOE) facility point of contact listing, information regarding interviews conducted, listing of documents reviewed, an acronym listing, and other key support documentation needed for completion of the assessment.

G. Program Evaluation

To ensure the program's continued validity, the Training Assessment Program is to be self-assessed each fiscal year. Strengths and weaknesses inherent to the program will be addressed and documented. Areas found to be deficient must be subject to corrective action measures in a timely manner.

1. An Annual Report shall be generated and include the following:

- a. an effectiveness summary
- b. pertinent statistical data
- c. performance indicators
- d. strengths
- e. weaknesses
- f. corrective actions.

IV. CONCLUSIONS

The Training Assessment Program is intended to be a means to improve the quality of transportation and packaging activities, including training, throughout the Department of Energy (DOE) complex.

ACKNOWLEDGEMENTS

Michael E. Burnside
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Westinghouse Hanford Company
Richland, Washington

REFERENCES

1. Code of Federal Regulations (CFR), Title 49, Part 172, Subpart H - "Training"
2. Department of Energy (DOE) Order 1540.1A "Materials Transportation and Traffic Management"
3. Department of Energy (DOE) Order 5480.3 "Safety Requirements for the Packaging and Transportation of Hazardous Materials, Hazardous Substances, and Hazardous Waste"
4. Department of Energy (DOE) Order 5700.6C "Quality Assurance"

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