



Regulatory Perspective on Training

for the
Energy Facility Contractors Group
ISM/QA Working Group



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Training Fundamental Concept



- Train workers to:
 - the work to be performed and
 - recognize and respond to the hazards that may be encountered.



Requirements for Training



- 10 CFR Part 830 training requirements
- 10 CFR Part 835 training requirements
- 10 CFR Part 851 training requirements
- Planned training for DOE O 414



Training Requirements in 10 CFR Part 830



- Subpart A – *Quality Assurance*, Criterion 2—
Management/Personnel Training and Qualification
 - Train and qualify personnel to be capable of performing their assigned work.
 - Provide continuing training to personnel to maintain their job proficiency.
- Subpart B, *Safety Basis*
 - Training is considered to be a safety management program.
 - The safe harbor provisions in the Appendix A to Subpart B also mention training to meet the provisions of 29 CFR 1910.120 and 29 CFR 1926.65 when they are used as a part of a safe harbor for developing a safety basis.



Training Requirements in 10 CFR Part 830



- Webpage:
 - <http://www.hss.energy.gov/nuclearsafety/ns/rules.html>



Training Requirements in 10 CFR Part 835



- § 835.103 Education, training and skills.
 - Individuals responsible for developing and implementing measures necessary for ensuring compliance with the requirements of this part shall have the appropriate education, training, and skills to discharge these responsibilities.
- For Radiological Control Technicians
 - DOE HDBK-1122-2009 provides acceptable content



Training Requirements in 10 CFR Part 835



- § 835.901 Radiation safety training.
 - Regulation lists topics to be included in training.
 - Proper training must be completed before unescorted access to controlled area, working as a radiological worker, or receiving occupational dose.
 - Escorts must be trained.
 - Retraining is required when there is a significant change.
 - Training records must be retained to demonstrate compliance.



Training Requirements in 10 CFR Part 835



- GERT
 - DOE-HDBK-1131-2007, *General Employee Radiological Training*, provides acceptable content
- Radiation Worker
 - DOE-HDBK-1130-2008, *Radiological Worker Training*, provides acceptable content



Training Requirements in 10 CFR Part 835



- Contact:
 - Pete O’Connell
 - 301-903-5641
 - Peter.O’Connell@hq.doe.gov
- Webpage:
 - <http://www.hss.energy.gov/HealthSafety/WSHP/Radiation/rule.html>



Training Requirements in 10 CFR Part 851



- Worker safety and health training and information program
 - Training and information provided to workers with safety and health program responsibilities.
- Additional training
 - New workers
 - Periodic training
 - When a change indicates that a new or increased hazard exists.



Training Requirements in 10 CFR Part 851



- Appendix A
 - Emergency Response Organization
 - Pressure safety
 - Firearms safety
 - Biological hazards
 - Specialty vehicle operators
 - Safety analysis of firearms training activities



Training Requirements in 10 CFR Part 851



- 29 CFR imposes training for specific hazards
- 10 CFR 851 incorporates all of 29 CFR by reference.
- 29 CFR 1910.9 and 29 CFR 1926
 - *Training* . Standards in this part requiring training on hazards and related matters, such as standards requiring that employees receive training or that the employer train employees, provide training to employees, or institute or implement a training program, impose a separate compliance duty with respect to each employee covered by the requirement. The employer must train each affected employee in the manner required by the standard, and each failure to train an employee may be considered a separate violation.



Training Requirements in 10 CFR Part 851



- Examples of training requirements in 29 CFR:
 - 1910.332, Electrical safety related work practices
 - 1910.38, Emergency action plan training
 - 1926.21, Safety training and education
 - 1926.454, Scaffolding
 - 1926.503, Falling
 - 1926.761, Steel erection
- Some unions are providing Part 851 training



Training Requirements in 10 CFR Part 851



- Contact
 - Bill McArthur
 - (301) 903-9674
 - Bill.McArthur@hq.doe.gov
- Webpage:
 - <http://www.hss.energy.gov/HealthSafety/WSHP/rule851/851final.html>



Planned Training on DOE O 414



- DOE HQ on QA for DOE
- Revised DOE O 414
- Non-government, QA standards (NQA-1, ISO 9001, etc.)



Planned QA Training



- Talking to National Training Center (NTC) for possible support on presentation and organization of QA training.
- Considering “train the trainer”