

Attachment B

**WCO QUALIFICATION AND TRAINING
REQUIREMENTS**

Job Qualification

Title: Waste Certification Official

Education Required:

A minimum of a B.S. degree in science, engineering, or related discipline or an equivalent of experience, education, and specialized training is required.

Experience Required:

Three years of job-related experience and one year of nuclear or research facility experience or equivalent are required.

Required Skills:

Ability to apply comprehensive knowledge of the following elements; basic quality assurance and certification program principles, federal and state regulatory requirements (RCRA/CERCLA/DOT), DOE Orders, waste characterization techniques and requirements of both internal and external Waste Acceptance Criteria (WAC).

Major Roles and Responsibilities:

- Certify as UT-Battelle authorized representative that wastes to be transferred for treatment storage, and/or disposal meet the receiving organization's waste acceptance requirements.
- Establishment, preparation, and maintenance of an UT-Battelle Waste Certification Program (WCP) in compliance with the UT-Battelle prime contract and applicable portions of DOE Order 435.1, 40 CFR, and ORNL policies and objectives.
- Oversee the implementation of the UT-Battelle WCP. Communicate program requirements and changes through the Waste Certification Home Page.
- Review and concur with waste certification training requirements.
- Establish and maintain documentation that supports WCP implementation including: (1) UT-Battelle WACs for all waste streams (if applicable), (2) implementing procedures; and (3) guidance documents.
- Establish and maintain a formal change process for management of controlled documents (e.g., WACs, implementing procedures).
- Establish and maintain a record retention system for program quality records.
- Compute and track control point error rates and ensure appropriate actions are taken when error rate limits are exceeded.

- Approve sampling groups and individuals for NRA determination; oversee review of NRA analytical protocols for demonstrated equivalency and oversee case-by-case evaluation of Naturally Occurring Radioactive Material for NRA determination.
- Provide oversight of off-site shipments, where applicable, to ensure compliance with WAC and certify waste by signature for transfer to the receiving organization/facility. In this function must be knowledgeable of off-site disposal/WACs (e.g., Nevada Test Site, Hanford, etc.).
- Interface with WCP, waste operations, compliance, and transportation personnel and waste generators as needed.
- Establish and implement a quality assurance verification program assessing the need for corrective actions based on analytical or error rate tracking and trending.

Training Requirements for WCO & Alternate WCO Position

The following training modules must be completed to carry out the duties and responsibilities of an ORNL Waste Certification Official.

Module ¹	Frequency ²	Topic
	1-time	Asbestos General Employee Awareness
017711	2	Radiological II Training for UT-Battelle/ORNL - DOE Core
017899	3	RCRA Hazardous Waste Characterization at ORNL
018176	1	RCRA Land Disposal Restrictions for Generators at ORNL
090150	3	DOT HM-126F General Awareness/Familiarization
090152	3	DOT HM-126F Identification of Hazardous Materials
090153	3	DOT HM-126F Packing Operations
090154	3	DOT HM-126F Marking
090155	3	DOT HM-126F Labeling
090156	3	DOT HM-126F Shipping Papers
090160	3	DOT HM-126F Safety
090163	1-time	Basic Environmental Law
090164	2	Tennessee Rule 1200-1-11-10- 40 CFR 268 LDR Notification/Certification
090169	3	Solid Low-Level Waste/Generator Interface Program
090170	3	Transuranic Waste/Generator Interface Program
090172	3	Hazardous Mixed/Generator Interface Program
090175	1 -time	Managing Polychlorinated Biphenyls (PCBS) at ORNL
090275	1-time	Management of Sanitary/Industrial Wastes
090307	1-time	No-Rad Added
090439	1-time	RCRA Fundamentals: Avoiding the Most Common Mistakes in Waste Identification -- McCoy

¹Or updated equivalent

²Number indicates years between retraining - significant changes in laws, regulations, procedures, etc. may increase the frequency

Training Requirements for WCO & Alternate WCO Position (cont.)

090441	1-time	Advanced RCRA Topics -- McCoy ¹
090442	1-time	RCRA Land Disposal Restrictions (LDR) -- McCoy
090596	1-time	Oak Ridge Reservation Certification Program Awareness Training
090597	1-time	Master Waste Profile Classification of Wastestreams
090607	1-time	BJC Master Waste Profile - (LLW /TRU)
-----	-----	Characterization Methodology (to be developed)
-----	-----	Interpreting Analytical Results (to be developed)

¹Or updated equivalent

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