

Training Requirements for Gauge Workers

Handling and use of portable gauging devices is restricted to authorized and trained personnel.

There are three training components associated with portable gauging devices.

Radiation awareness training (instructions to workers) will be provided to each worker handling or operating portable gauging devices, and to any other worker likely to exceed 100 millirem/year from the company's licensed operations as determined by the RSO.

Authorized User training will be provided to workers independently using portable gauging devices or supervising their use by other workers.

Hazmat employee training will be provided to any worker involved in work that directly affects radioactive material transportation.

Radiation Awareness Training/Instructions to Workers

- A.** Prior to handling, transporting or operating portable gauging devices, all workers will receive general radiation safety training including:
- ◆ Information on the storage, transfer, or use of portable gauging devices at permanent facilities and temporary job sites
 - ◆ The health protection problems associated with exposure to ionizing radiation or radioactive material
 - ◆ Precautions and procedures used to minimize exposures
 - ◆ Applicable provisions of radiation control regulations and the radioactive materials license
 - ◆ Workers' responsibility to report any unsafe conditions
 - ◆ Appropriate responses to warnings made in the event of incidents having the potential to involve radiation exposure
 - ◆ Reporting requirements for occupational radiation exposures
- B.** Training duration may vary based on attendees' comprehension of the topics covered. An opportunity to ask questions and receive answers and clarification must be available (Q&A Forum).
- C.** Documentation of training will be maintained to demonstrate compliance.

Gauge Operator/Authorized User (AU) Training

- A. Portable gauging devices will be used by individuals that have completed at least 8 hours of formal radiation safety training. Authorized Users (AUs) will complete an accepted training course. Any third party course offered by a gauge manufacturer or independent consultant may be used, provided it has been approved.
- B. If in-house radiation safety training is provided, it will be conducted in accordance with a training program that has been approved by the regulatory agency and incorporated into the company's radiation protection program.
- Operating and emergency (O&E) procedures must be included as a required training topic. Unless training in our company's O&E procedures is specifically addressed during third party training and documentation is provided by the trainer demonstrating its inclusion in the course, additional in-house training in O&E procedures will be provided by the RSO and acknowledgement documentation of O&E procedures training will be provided for each worker.
- C. Documentation of radiation safety training for each AU will be maintained on file for inspection purposes.

Hazmat Employee Training

- A. Radioactive material contained in portable gauges is classified as hazardous material by the U.S. Department of Transportation (DOT). In accordance with DOT regulations (49 CFR Part 172, Subpart H) workers must complete hazmat training prior to performing work that directly affects hazardous material transportation safety. (Exception: employees can work for 90 days without the training, provided a hazmat-trained employee directly supervises them.) Refresher training must be provided.
- B. Hazmat training will include the following: general awareness/familiarization, function specific, safety training, and security awareness. It will be provided either in-house or by qualified third party trainers. **Completion of radiation awareness training and gauge operator/AU training can satisfy the hazmat training requirement; however, a separate training certificate is required** (see below).
- C. Documentation of hazmat training will be maintained for the duration of each worker's employment, plus 90 days, and will include the following information:
- * The employee's name and date of most recent training completed;
 - * Description, copy or location of training materials used;
 - * Name and address of the person providing the training; and
 - * Certification that the employee has been trained and tested as required.