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Emergency Management	Emergency Plan Implementing Procedures	For Additional Info: http://EDMS	Effective Date: 04/22/09
Manual: 16E – Emergency Management – Emergency Plan Implementing Procedures		USE TYPE 3	Change Number: <u>325806</u>

1. PURPOSE AND SCOPE

This procedure specifies requirements regarding initial and requalification training for personnel in the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI) Command Post (CP) who may be potential members of, or are members of, the emergency response organization (ERO); implementing the training; and administering the training program. Satisfactory completion of required training ensures that FSV ISFSI ERO members can perform the tasks inherent to their ERO positions and operate within the chain-of-command established for the ERO.

INTEC Emergency Control Center (ECC) personnel provide support to the FSV ISFSI CP and are trained on FSV specific hazards and their associated responsibilities. Training is provided in accordance with Section 13, Training and Drills, of Plan-2012, “ICP Emergency/RCRA Contingency Plan,” and therefore, is not included as a part of this procedure.

2. INITIATING CONDITION

Title 10, Code of Federal Regulations, Part 72.32, “Emergency Plan,” requires that workers are trained on how to respond to an emergency based on the facility emergency plan.

3. RESPONSIBILITIES

3.1 **FSV ISFSI Manager**: The FSV ISFSI manager is responsible for ensuring that personnel are assigned to fill required ERO positions and attain and maintain qualification through attendance and participation in the training and drill and exercise programs.

3.2 **ICP Emergency Management Functional Support Manager**: The Emergency Management Functional Support manager is responsible for:

- Developing and maintaining a comprehensive training program plan
- Overseeing the emergency management training program to ensure training is provided to ERO members
- Coordinating and integrating the ERO training program with other facility training programs

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- Identifying and coordinating adequate resources for training program implementation
- Identifying training needs and providing for training development, scheduling, and delivery
- Ensuring that training is conducted by qualified personnel
- Conducting training program self-assessments, including evaluating instruction and reviewing materials.

3.3 **ICP Emergency Management Department Staff**: The Emergency Management Department personnel assigned to the training function are responsible for analyzing, designing, developing, implementing, and conducting self-assessments of the emergency management training program and its components, as directed by the Emergency Management Functional Support manager and company training procedures.

4. INSTRUCTIONS

4.1 Emergency Response Organization Training

4.1.1 Initial Training

4.1.1.1 As part of initial training, potential ERO members must receive:

- General information regarding ERO assignment requirements and orientation.
- Training specific to the following functions:
 - FSV emergency response
 - Reentry planning
 - Recovery planning
 - Emergency exposure control.

4.1.1.2 Potential ERO members must complete required initial training and participate in a drill/exercise in their assigned ERO positions prior to participating in an actual emergency as an ERO member.

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Page: 3 of 6**4.1.2 Requalification Training**

4.1.2.1 Annual requalification training must address the following:

- Retraining topics identified during job analyses
- Lessons learned during drills, exercises, and actual events
- Changes to plans and procedures.

4.1.2.2 ERO members must participate in at least one drill/exercise annually in the position for which they are qualified.

4.2 Training Implementation

4.2.1 All emergency management training must be approved by the ICP Emergency Management Functional Support manager prior to implementation.

4.2.2 The ICP Emergency Management Functional Support manager must maintain control over the development and delivery of new lesson materials as follows:

4.2.2.1 The ICP Emergency Management Functional Support manager must approve new training development activities before any resources are applied to the project.

4.2.2.2 To proceed with training development, the ICP Emergency Management Functional Support manager must document approval.

4.2.2.3 The ICP Emergency Management Functional Support manager must ensure a list of official course titles and descriptions are maintained and available upon request.

4.2.2.4 To obtain interim approval for existing training materials, sufficient documentation must be presented for that course to be entered into the Training Records and Information Network (TRAIN) and the ICP Emergency Management Functional Support manager must grant interim approval by signing the cover/approval page.

4.2.2.5 Training cannot be delivered prior to meeting the minimum requirements for interim approval.

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- 4.2.3 Documentation of course approval must be forwarded to the TRAIN administrator for inclusion in the records system.
- 4.2.4 Training must be delivered by qualified training staff only.
- 4.2.5 Training attendance must be recorded and tracked using the appropriate form.
- 4.2.6 A potential or an existing ERO member can be exempted from training as follows:
- 4.2.6.1 A training exception can be granted to a potential or an existing ERO member who has satisfactorily completed a training program that is comparable in content and performance standards on an individual basis.
- 4.2.6.2 A training exception must be based on the following:
- Review of historical training records (e.g., transcripts)
 - Personal interviews.
- 4.2.6.3 The ICP Emergency Management Functional Support manager must approve any training exception.
- 4.2.7 ERO training courses must be evaluated as follows:
- 4.2.7.1 ERO training courses must be continuously evaluated through the existing review and approval process for instructional materials.
- 4.2.7.2 Changes to training courses must be incorporated, as necessary, according to changes in documentation that supports the emergency management training program, such as procedures and plans.
- 4.2.7.3 Training presentation history forms must be collected following course completion and used to revise courses during the annual course review process.
- 4.2.8 The ERO training program may be changed as follows:
- 4.2.8.1 The ERO training program is subject to change based on changes to the ERO structure and PLN-2012, “ICP

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Emergency Plan/RCRA Contingency Plan” and emergency plan implementing procedures.

4.2.8.2 When changes occur that affect various ERO positions, the effects must be analyzed and the documentation updated.

4.2.8.3 Instructional materials must be revised according to revised analysis data.

4.3 Emergency Management Training Program Administration

4.3.1 Training program records includes the materials used to conduct training, which may consist of the following:

- Written lesson plans
- Electronic files of lesson plans
- Instructional aids used in developing and delivering training.

4.3.2 Training program records (i.e., the actual materials used in conducting training for classroom, lab, or self-study must be captured and retained in an archival records system.

4.3.3 Training materials used routinely to deliver training (e.g., lesson plans) must be current as follows:

4.3.3.1 Training materials must be managed and controlled to avoid the use of noncurrent materials by instructors.

4.3.3.2 Course revision activity must be documented and filed in archived records.

4.3.3.3 Individual instructors must ensure that lesson plans and trainee materials, including any exams or exam bank questions they plan to use are current by contacting an Emergency Management Department Training Program representative to verify the status or requesting a copy of the current documentation.

4.3.3.4 Training materials must be reviewed annually to ensure accuracy is maintained.

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- 4.3.4 Prior to assignment to an ERO position, potential ERO members must complete all facility-specific training requirements.
- 4.3.5 The FSV ISFSI manager must ensure that all facility-specific training is completed prior to assigning personnel to ERO positions.
- 4.3.6 ERO members must requalify annually (calendar year basis) for their ERO positions.

5. RECORDS

Training records

6. APPENDICES

None