

**V. Training Program**  
**Nevada Division of Environmental Protection**  
**Chemical Accident Prevention Program**  
**Element Audit Checklist**

Revision 1a, 04/07/09



<b>Facility:</b>	<b>Process(es) Covered:</b>	<b>Date:</b>	
<b>A. PROCEDURE/POLICY REVIEW</b>			
<b>1) EXISTENCE OF TRAINING PROGRAM</b>			<b>Percentage Completion</b> <b>Score – Total 100%</b> (Weighting of Elements is Defined Below)
Overall NDEP-CAPP Element Audit Checklist Score for the Training Program (as evaluated in sections 2 through 8 below).			%
<b>Notes/Comments Pertaining to Responses to Questions under Issue 1):</b>			
<b>2) SCOPE OF INITIAL TRAINING</b>			<b>NAC Ref.</b>
			<b>Resp. Code</b>
<i>Item #2 Completion Score – Weighted 10% of Total</i>			%
<b>Do the subjects covered by initial training include:</b>			
i. An overview of the process?		459.95418(1)	
ii. Relevant operating procedures?		459.95418(1)	
iii. Plant layout?		459.95418(1)	
iv. Location of equipment and instruments?		459.95418(1)	
v. Specific safety and health hazards?		459.95418(1)	
vi. Emergency operations and emergency shutdown?		459.95418(1)	

Response Code (Point Valve): Y = Yes (1), N = No (0), NA = Not Applicable (Not Scored), U = Undetermined (0), P = Partially Satisfied (½), NR = Not Reviewed (Not Scored), R = Reviewed (1)

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vii. Relevant safe work practices?	459.95418(1)	
viii. Management of Change program?	459.95418(1)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 2):</b>		
<b>3) SCOPE OF REFRESHER TRAINING</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #3 Completion Score – Weighted 10% of Total</i>	%	
i. Does the scope of operator refresher training train operators in current operating procedures to ensure employees understand and adhere to procedures?	459.95418(3)	
ii. Is the frequency of the refresher training 3 years, or less?	459.95418(3)	
iii. Is there a mechanism that solicits employee input on refresher training scope and frequency?	459.95418(3)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>		
<b>4) AREAS OF TRAINING</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #4 Completion Score – Weighted 10% of Total</i>	%	
i. Is there a Training Syllabus for EACH position that operates this process, related to Initial Training?	459.95418(4)	
ii. Is there a Training Syllabus for EACH position that operates this process, related to Refresher Training?	459.95418(4)	
iii. Are the training sessions and associated training materials provided in a manner that can be understood by all employees requiring training under this section?	459.95418	

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<b>Notes/Comments Pertaining to Responses to Questions under Issue 4):</b>		
<b>5) EVALUATION OF EMPLOYEE COMPREHENSION OF TRAINING</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #5 Completion Score – Weighted 10% of Total</i>	%	
i. Does the facility define the methods to be used to ascertain whether each employee involved in operating a process has comprehended the training?	459.95418(5)	
ii. Whether oral, written, observation of job performance, or a combination of methods is used to determine comprehension, is the test content documented (note: even an oral test administered in the field must have documented criteria for evaluation)?	459.95418(5)	
iii. Is a Passing/Failing criteria established for each test?	459.95418(5)	
iv. Is performance of the employee in the defined operational position dependent upon achieving a passing score on the comprehension test?	459.95418(5)	
v. Is employee comprehension evaluated for both Initial and Refresher Training?	459.95418(5)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 5):</b>		
<b>6) TRAINING PROGRAM DOCUMENTATION</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #6 Completion Score – Weighted 5% of Total</i>	%	
i. Does the facility maintain Records of the Training required by this section for each employee involved in operating the process?	459.95418(6)	

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ii.	Do the Training Program Records require:	459.95418(6)	
a.	The identity of the employee	459.95418(6)	
b.	The date of training	459.95418(6)	
c.	The substance of the training provided on that date	459.95418(6)	
d.	The means used to verify that the employee comprehended the training (testing records)?	459.95418(6)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 6):</b>			
<b>7) MANAGEMENT PLAN AND DOCUMENT CONTROL</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #7 Completion Score – Weighted 5% of Total</i>		%	
i.	Is there a site-specific plan that addresses how the Training Program requirements will be developed and maintained, including:	459.95341	
a.	Document the names of person(s) who are members of the team with overall responsibility for the development, implementation and integration of the Training Program Requirements?	459.95341	
b.	How is facility program monitored for compliance with NAC 459.95418, CAPP Training Program?	459.95341	
c.	How it has been determined that all appropriate training subjects have been identified and the appropriate training methods have been developed.	459.95341	
d.	How Training Program materials are developed, reviewed and approved (including development of instructional materials, the methods used to determine comprehension and the methods to document successful training in facility and personnel training records.	459.95341	
e.	Does the Training Program define who conducts training?	459.95341	

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f.	How the Training Program is reviewed, and at what frequency, to determine that personnel have received the training necessary to perform their job tasks?	459.95341	
g.	How the Training Program is determined to provide clear instruction in a manner understood by all operators?	459.95341	
ii.	Is there a site-specific policy or procedure that addresses how Training Program documentation is controlled to ensure that the most current information is in circulation and use?	459.95341	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 7):</b>			
<b>8)</b>	<b>VERIFICATION OF TRAINING PROGRAM IMPLEMENTATION</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<i>Item #8 Completion Score – Weighted 50% of Total</i>		%	
i.	Does the review of actual training records indicate that INITIAL and REFRESHER TRAINING is being conducted pursuant to CAPP requirements? <i>Refer to Part B-1</i>	459.95418(1) 459.95418(3)	
ii.	Does the review of actual training records indicate that COMPREHENSION of initial and refresher training is being evaluated pursuant to CAPP requirements? <i>Refer to Part B-2</i>	459.95418(5)	
iii.	Does the review of actual records indicate that employees have been consulted on the scope and frequency of refresher training? <i>Refer to Part B-3</i>	459.95418(3)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 8):</b>			
<b>General Records Audit/Review Notes/Comments:</b>			

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<b>B. ON-SITE INSPECTION - RECORDS AUDIT</b>								
<b>1) SELECT 2 TO 4 TRAINING FILES/RECORDS TO REVIEW AGAINST ACTUAL PRACTICE</b> (Attempt to represent records for initial and refresher training). <i>List on the Following Table:</i>								
#	Employee ID # or Name	Description -Title of Operator Position (note initial or refresher training)						
i								
ii								
iii								
iv								
<b>Inquiry/Observation</b> ('Y' Indicates presence of training record and successful comprehension evaluation)				<b>Resp. Code:</b>				
				<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">i</td> <td style="width: 25%; text-align: center;">ii</td> <td style="width: 25%; text-align: center;">iii</td> <td style="width: 25%; text-align: center;">iv</td> </tr> </table>	i	ii	iii	iv
i	ii	iii	iv					
<b>Relevant General Facility &amp; Process Knowledge</b>								
a. Overview of the process (including process flows, equipment & instruments involved, key operating variables, reading process flow diagrams, reading piping & instrument diagrams)								
b. Layout of the plant (e.g., physical layout of process, including pipe routing)								
c. Location of equipment, controls and instruments								
d. Specific safety & health hazards								
e. Management of Change								
<b>Relevant Standard Operating Procedures (also refer to NAC 459.95416)</b>								

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f. Initial Start-Up procedures (for commissioning of new process)				
g. Normal Operating procedures				
h. Temporary Operating procedures				
i. Emergency Shut-Down procedures				
j. Emergency Operating procedures				
k. Normal Shut-Down procedure for Turnaround				
l. Shut-Down procedure to place in Standby Mode of Operation (i.e., Warm Shut-Down)				
m. Start-Up procedure following a Turnaround				
n. Start-Up procedure following an Emergency Shut-Down or Warm Shut-Down				
o. Safe Operating Limits				
p. Safety and Health considerations				
q. Safety System Description (SSD)				
<b>Relevant Safe Work Practices (also refer to NAC 459.95416 &amp; 459.95433)</b>				
r. Lock-Out/Tag-Out (Control of Hazardous Energy)				
s. Confined Space Entry				
t. Opening Process Equipment or Piping (Line Breaking)				
u. Entrance into the facility and/or specific process area(s) by maintenance, contractor, or other support personnel (Controlled Access)				

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v. Hot Work				
w. Other Safe Work Practices				
x. Does the employee training record meet the requirements of this section?				
<b>Notes/Comments Pertaining to Responses to Questions under Issue 1):</b>				
<b>2) COMPREHENSION OF TRAINING</b>				
y. Did the employee successfully pass a defined method to evaluate comprehension (oral, written, observation of job performance, or a combination of methods?)				
<b>Notes/Comments Pertaining to Responses to Questions under Issue 2):</b>				
<b>3) EMPLOYEE CONSULTATION</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>		
i. Is there documentation indicating that employees have been consulted on frequency and scope of refresher training?	459.95418(3)			
<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>				
<b>General On-Site Inspection and Records Audit Notes/Comments:</b>				



**C. INTERVIEWS**

**1) SELECT TWO OR MORE PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE TRAINING PROGRAM USING THE FOLLOWING QUESTION SETS.**

*Responses are to be Logged on Following Pages:*

<b>Question Set</b>	<b>Questions to Consider</b>
<b>a</b>	What is your job description and associated tasks?
<b>b</b>	Describe the type of training that you have been provided. Were you tested? What kind of safety & health training have you had?
<b>c</b>	Can you explain how the process works (get walkthrough with explanation of main process flows, safety systems and controls plus a general description of their duties)? Do you feel that the training was adequate in this area? Suggested improvements?
<b>d</b>	Do you issue Hot Work, Confined Space, etc, permits to perform work in your process area? What is your role in implementing [ <i>select a safe work practice</i> ] (look for an understanding of the permit system, how they perform their task and the responsibilities of other parties)?
<b>e</b>	Have you ever received refresher training? Were you involved in determining the frequency and scope of refresher training? Is refresher training adequate?
<b>f</b>	Do you feel that the tests adequately evaluated your knowledge of the training (were the tests too easy, could they be passed without adequate knowledge of the process and procedures)? Is performance of your duties contingent upon passing the tests?

**2) RECORD RESPONSES OF SELECTED PERSONNEL TO QUESTIONS FROM THE QUESTION SETS**

*Refer to Part C-1*

**Employee Profile**

<b>Job Title/Position</b>	<b>Department/Unit/Group</b>	<b>Time in Job</b>	<b>Time w/Co.</b>

**Response to Question Set \_ :**