

SEP 3 1996

ENGINEERING DATA TRANSMITTAL

Page 1 of 1
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1	WHC-SD-TWR-SRID-002		0	High Level Waste Storage Tanks/242-A Evaporator S/RID Phase 1 Assessment Corrective Actions/Compliance Schedule Approval Report	N/A	1,2	1	1

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Approval Designator (F)			Reason for Transmittal (G)				Disposition (H) & (I)				
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			3. Information		6. Dist. (Receipt Acknow. Required)		3. Disapproved w/comment		6. Receipt acknowledged		
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Reason	Disp.	(J) Name	(K) Signature	(L) Date	(M) MSIN	(J) Name	(K) Signature	(L) Date	(M) MSIN	Reason	Disp.
2	1	Cog. Engr. E. Biebesheimer	<i>E. Biebesheimer</i>	9-20-96	R2-52	J.H. Wicks *			R2-50	3	
2	1	Cog. Mgr. C.L. Day-Phalen	<i>C.L. Day-Phalen</i>	9/20/96	R2-52	S. Ailes			R2-52	3	
						G.L. Bennett			B1-14	3	
* EDT only											
18. E. Biebesheimer <i>E. Biebesheimer</i> Signature of EDT Originator			19. C.L. Day-Phalen <i>C.L. Day-Phalen</i> Authorized Representative for Receiving Organization			20. C.L. Day-Phalen <i>C.L. Day-Phalen</i> Cognizant Manager			21. DOE APPROVAL (if required) Ctrl. No. <input type="checkbox"/> Approved <input type="checkbox"/> Approved w/comments <input type="checkbox"/> Disapproved w/comments		



High Level Waste Storage Tank Farms/242-A Evaporator Standards/Requirements Identification Document Phase 1 Assessment Corrective Actions/Compliance Schedule Approval Report

E. Biebesheimer

Westinghouse Hanford Company, Richland, WA 99352
U.S. Department of Energy Contract DE-AC06-87RL10930

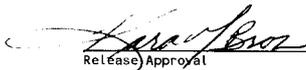
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Org Code: 77850 Charge Code: N1565
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Key Words: S/RID, Phase 1, Compliance Schedule Approval, CSA,
Requirements Management.

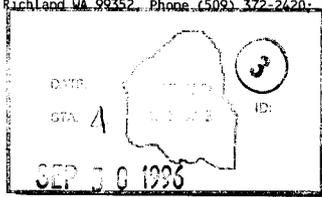
Abstract: This document, the Standards/Requirements Identification Document (S/RID) Phase 1 Assessment Corrective Actions/Compliance Schedule Approval Report for the subject facility, contains the corrective actions required to bring the facility into compliance as a result of an Administrative Assessment to determine whether S/RID requirements are fully addressed by existing policies, plans or procedures. These actions are delineated in the Compliance Schedule Approvals which also contain; noncompliances, risks, compensatory measures, schedules for corrective actions, justifications for approval, and resource impacts.

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Release Approval

9/30/96
Date



Approved for Public Release

CONTENTS

The High-Level Waste Storage Tank Farms/242-A Evaporator Standards/Requirements Identification Document (S/RID) Phase 1 Assessment Corrective Actions/Compliance Schedule Approval Report discusses ten functional areas which were found to have discrepancies. These ten functional areas are depicted in eight attachments which contain either a memo delineating resolution of discrepancy, Compliance Schedule Approval(s) or both.

The ten functional areas listed below follow as attachments

<u>Attachment</u>	<u>Functional Area</u>
1.	Management Systems
2.	Configuration Management
3.	Training and Qualification
4.	Emergency Preparedness
5.	Construction
6.	Operations
7.	Fire Protection & Occupational Safety and Health
8.	Waste Management & Environmental Protection

1.0 INTRODUCTION

This report documents the corrective actions resulting from a facility assessment. The assessment was based on the High Level Waste Storage Tank Farms/242-A Evaporator Standards/Requirements Identification Document (hereafter, Tank Farm S/RID). The Phase 1 Administrative Assessment determined whether requirements were fully addressed by existing policies, plans or procedures. Results from the Phase 1 Assessment are documented in a Supporting Document (WHC-SD-TWR-SRID-001, Rev 0).

The corrective actions address Tank Farms S/RID (WHC-SD-MP-SRID-001, Rev. 1b) requirement discrepancies found during the assessment. This report also serves as part of the evidence for completion of RL Milestone Number T21-96-618.

2.0 DESCRIPTION

The Tank Farm S/RID is comprised of 20 Functional Areas, three of which contain no requirements at this time. Of the 17 areas with requirements ten had discrepancies. **Table 2.1 Discrepancies by Functional Area** recaps the discrepancies determined in the Phase 1 Administrative Assessment. Functional areas not found on **Table 2.1** have no discrepant requirements.

Actions taken to mitigate discrepancies fell into four categories:

- 1) discrepancies that were re-evaluated and determined to be "incorporated"
- 2) discrepancies that were re-evaluated and determined to be "not applicable"
- 3) discrepancies that were resolved by procedure revision
- 4) discrepancies that will be addressed by procedure revision in the future.

Assessment results are recorded in the Environmental Requirements Management Interface (ERMI 2.0) data base. For discrepancies that fell into the first two categories, the ERMI 2.0 database was updated. Discrepancies that fall into the latter two categories are discussed in this report. Attachments to this report contain a memo, a Compliance Schedule Approval (CSA), or both.

Table 2.1 Discrepancies by Functional Area

FUNCTIONAL AREA	NUMBER OF DISCREPANCIES	DISCREPANCIES REQUIRING CSA	ATTACHMENT NUMBER
(1) Management Systems	2	2	1
(3) Configuration Management	4	3	2
(4) Training & Qualifications	11	1	3
(5) Emergency Preparedness	25	25	4
(8) Construction	4	2	5
(9) Operations	5	1	6
(12) Fire Protection	2	2	7
(16) Waste Management	27	4	8
(17) Occupational Safety and Health	13	13	7
(20) Environmental Protection	1	0	8

None of the discrepancies expose the worker, public, or the environment to increased risk. Management assessment programs are in place to evaluate the effectiveness of management controls. Most of the discrepant requirements are implemented, in intent, through various training programs and management controls.

The Attachment memos document discrepancies in categories 1), 2), or 3). The Attachments contain CSAs for category 4) discrepancies. **Table 2.2 Attachments** shows these 10 Functional Areas, the number of discrepancies and attachment number.

Table 2.2 Attachments

ATTACHMENT	Functional Area
1	Management Systems
2	Configuration Management
3	Training & Qualification
4	Emergency Preparedness
5	Construction
6	Operations
7	Fire Protection and Occupational Safety & Health
8	Waste Management and Environmental Protection

Management Systems

Attachment 1

Compliance Schedule Approval Form

September 23, 1996
WHC-TFO-MS-001

P. F. Schmitt
Originator

Paul F. Schmitt
23 Sept '96
Date

F. O. Strankman
Reviewer

F. O. Strankman
9/23/96
Date

J. H. Wicks
Approval

J. H. Wicks
9/27/96
Date

1.0 REQUIREMENT

1) **DOE5480.26 Section 7.a.(1)**

"For all DOE facilities included in the DOE PI program, contractors shall provide their PI report addressing the specified list of Performance Indicators, provided in subparagraph c below, to the cognizant Field Organization, on a quarterly basis. For those facilities identified in Appendix 1 of DOE-STD-1048-92, which do not report to a Field Office, their quarterly report should be sent directly to the cognizant PSO."

2) **DOE5480.19(920518) Chapter VI, Section C.8**

"Patterns of deficiencies such as operator errors or inadequate procedures should be trended. A periodic summary report of events, causes, and trends should be submitted to department heads, the facility manager, and appropriate managers. Department heads should ensure training programs include appropriate material from the summary report."

2.0 NONCOMPLIANCE

1) The requirement for a quarterly PI report submitted to the Field office isn't documented in WHC-IP-0842 Volume 1 Section 2.5, the section dealing with the Performance Indicator Program.

2) **WHC-IP-0842 doesn't require periodic summary reports of events, causes, and trends be submitted to department heads, facility manager, and appropriate managers. It does require that deficiency patterns are trended and that training programs are appraised of lessons learned from Occurrence Reports and Critiques.**

3.0 RISK

These noncompliances pose no increased risk to the health and safety of the worker, the public, or the environment.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

1) To WHC-IP-0842 Volume 1 Section 2.5, add notation that "Performance Indicator Reports must be submitted at least quarterly to the Field Office".

2) To WHC-IP-0842 Volume 1 Section 2.4, and Volume II Section 4.6.4, add notation that "A periodic Summary report of events, causes and trends should be submitted to department heads, the facility manager, and appropriate managers".

5.2 Schedule for Corrective Actions

The schedule for the completion of identified corrective actions is provided in Table 1. The table contains a brief description of the corrective action activity and applicable milestones; the responsible person for each activity/milestone; and the estimated start and completion dates for each activity/milestone.

6.0 JUSTIFICATION FOR APPROVAL

1) In practice Tank Farms is currently providing this information monthly. Therefore no adverse safety impacts are anticipated during the period of noncompliance.

2) The discrepancy doesn't pose a risk to the health and safety of the worker, the public, or the environment. Therefore no adverse safety impacts are anticipated during the period of noncompliance.

7.0 RESOURCE IMPACTS

The proposed schedule for corrective actions will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

Table 1 - Corrective Action Schedule

M. J. Royack _____
RL Approval Date

Table 1: Schedule for Corrective Actions

Requirement	Planned Corrective Action	Start Date	End Date	Responsible Organization
DOE5480.26 Section 7.a.(1)	Revise WHC-IP-0842 Volume I Section 2.5 to add notation that "Performance Indicator Reports must be submitted at least quarterly to the Field Office".	10/1/96	9/30/97	Org. Code 77810, Business Management
DOE5480.19(920518)Chapter VI, Section C.8	Revise WHC-IP-0842 Volume II Section 4.6.4 to add notation that "A periodic summary report of events, causes and trends should be submitted to department heads, the facility manager, and appropriate managers".	10/1/96	9/30/97	Org. Code 77000, Tank Farm Transition Projects
DOE5480.19(920518)Chapter VI, Section C.8	Revise WHC-IP-0842 Volume I Section 2.4 to add notation that "A periodic summary report of events, causes and trends should be submitted to department heads, the facility manager, and appropriate managers".	10/1/96	9/30/97	Org. Code 77850, Support Services and Business Improvements

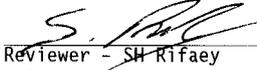
Configuration Management

Attachment 2

Compliance Schedule Approval Request

September 23, 1996
WHC-TFO-CM-001

 9/26/96
Originator - RR Stickney Date

 9/26/96
Reviewer - SH Rifaey Date

 9/26/96
Approval - JH Wicks Date

1.0 REQUIREMENT

The Tank Farm Transition Project Standards/Requirements Identification Document Configuration Management Functional Area identifies the following three requirements as applicable and discrepant in regard to implementation assessments:

DOE-STD-1073-93 Chapter 1, Section 1.3.5.1 Paragraph a, Sent. 1 thru 5
Initial assessments, [include] two vertical slice assessments... One of these should be on a safety system related to the principal facility hazard... Two horizontal slice assessments... one of these should be on change control and the other on a technical topical area... [should also be performed.]

DOE-STD-1073-93 Chapter 1, Section 1.3.5.1 Paragraph b
Post-implementation assessments. After the CM program upgrades are implemented, a horizontal slice assessment should be performed for each CM program element to determine if that element addresses identified weaknesses and is effective in accomplishing the CM functions. For each system design information summary (DIS) developed by the DR adjunct program, a field validation should be performed to ensure that the design requirements are accurately reflected in the physical configuration and the associated facility documentation. After the MCA adjunct program is developed, a technical quality review should be performed of its assumptions, methods, and products.

DOE-STD-1073-93 Chapter 1, Section 1.3.5.1 Paragraph c
Periodic effectiveness assessments. After the CM program and its adjunct programs have been implemented, a combination of vertical and horizontal slice assessments should be performed periodically to measure the overall CM program effectiveness and to determine if CM controls are adequate and appropriate. The results of these assessments should establish the basis for revisions to the CM program plan, either increasing or decreasing controls.

WHC-TFO-CM-001
September 23, 1996

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2.0 NONCOMPLIANCE

The noncompliance discovered during the Phase I assessment was related to inadequate incorporation of assessments of configuration management activities in the governing and implementation documents. Although requirements for assessments are addressed in Tank Farm procedures, the specific nature and scope of the requirements identified in section 1.0 are not explicitly addressed. As a result the noncompliance is administrative in nature and the specific discrepancy does not affect operational readiness, no major systems or activities are adversely affected and no occurrence reports are required.

3.0 RISK

There is no increased risk to the health and safety of the worker, the public, or the environment that is created by this noncompliance. Existing performance based management assessments already provide for vertical slice assessments and the evaluation of the effectiveness of management controls.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

The Configuration Management specific program assessment and upgrade action items will be addressed in the Tank Waste Remediation System Configuration Management Program Implementation Plan, WHC-SD-WM-CM-014, to be issued by September 30, 1996. In addition, WHC-IP-0842 will be revised to specifically address configuration management and change control assessment requirements into an integrated management assessment and requirements management program.

5.2 Schedule for Corrective Actions

The schedule for the completion of identified corrective actions is provided in Table 1. The table contains a brief description of the corrective action activity and applicable milestones; the responsible person for each activity/milestone; and the estimated start and completion dates for each activity/milestone.

WHC-TFO-CM-001
September 23, 1996

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6.0 JUSTIFICATION FOR APPROVAL

The identified S/RID implementation discrepancy is necessary to update forms and procedures to provide clear direction concerning incorporation of special requirements for assessments of configuration management activities. The proposed corrective action will be completed at the next revision cycle as indicated in Table 1. The discrepancy does not involve a safety-related compliance issue, nor does it affect the ability of WHC to demonstrate compliance with regulatory requirements. As result, no potential legal actions or other adverse safety impacts are anticipated during the period of noncompliance and no compensatory action is necessary.

7.0 RESOURCE IMPACTS

The proposed schedule for corrective action will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

Table 1 - Corrective Action Schedule

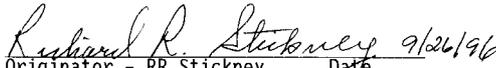
RL Approval _____ Date _____

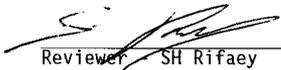
Table 1: Schedule for Corrective Actions

Requirement	Planned Corrective Action	Start Date	End Date	Responsible Organization
DOE-STD-1073-93 Chapter 1, Section 1.3.5.1, Paragraph a, Sent. 1 thru 5	Revise WHC-IP-0842 Volume 1 Section 2.10 and 6.0 to add provisions for conduct of initial assessments of configuration management activities.	10/1/96	9/30/97	Org. Code 77850, Support Services and Business Improvements
	Add provisions for conduct of initial configuration management assessments to WHC-SD-WM-CM-014 Criteria XII.	10/1/96	9/30/97	Org. Code 72230, Baseline Development/Mgmt Systems
DOE-STD-1073-93 Chapter 1, Section 1.3.5.1, Paragraph b	Revise WHC-IP-0842 Volume 1 Section 2.10 and 6.0, to add provisions to conduct post-implementation assessments to determine if corrective actions are effective for identified weaknesses.	10/1/96	9/30/97	Org. Code 77850, Support Services and Business Improvements
	Revise WHC-SD-WM-CM-014 Criteria XII CM Program Assessments to add provisions to conduct post-implementation assessments.	10/1/96	9/30/97	Org. Code 72230, Baseline Development/Mgmt Systems
DOE-STD-1073-93 Chapter 1, Section 1.3.5.1, Paragraph c	Revise WHC-IP-0842 Volume 1 Section 2.10 and 6.0, to add provisions to conduct periodic effectiveness assessments of the nature and scope specified.	10/1/96	9/30/97	Org. Code 77850, Support Services and Business Improvements
	Revise WHC-SD-WM-CM-014 Criteria XII CM Program Assessments to add provisions to conduct periodic effectiveness assessments.	10/1/96	9/30/97	Org. Code 72230, Baseline Development/Mgmt Systems

Compliance Schedule Approval Request

September 23, 1996
WHC-TFO-CM-002


Originator - RR Stickney Date 9/26/96


Reviewer - SH Rifaey Date 9/26/96


Approval - JH Wicks Date 9/27/96

1.0 REQUIREMENT

The Tank Farm Transition Project Standards/Requirements Identification Document Configuration Management Functional Area identifies the following requirement as being applicable and discrepant regarding configuration control for established databases:

DOE-STD-1073-93 Chapter 2, Section 21.3, Paragraph 7, Sentence 2
Special controls should be instituted to ensure that any database used for configuration management purposes will be protected to prevent inadvertent or unauthorized changes of the data.

2.0 NONCOMPLIANCE

The noncompliance discovered during the Phase 1 assessment was related to inadequate incorporation of procedural control for ensuring databases used for configuration management purposes are protected from inadvertent or unauthorized changes of the data. Although existing procedures describe requirements for the development and control of software systems, mathematical models for design, control of ADP equipment and entering information into document databases, no specific requirements are defined for the administration and control of established databases. Individual project software development plans partially cover this activity, but do not establish the necessary procedure hierarchy to ensure that management controls fully address the S/RID requirement for all projects. The noncompliance is considered administrative in nature and does not affect operational readiness. Because no major systems or activities are adversely affected, no occurrence reports are required.

3.0 RISK

There is no increased risk to the health and safety of the worker, the public, or the environment that is created by this noncompliance. Existing software system controls and development plans for large database projects (e.g. HATS) provide partial coverage of database configuration management requirements.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

The requirements for established database data security will be added to the Document Control and Records Management Manual (WHC-CM-3-5), the Standard Engineering Practices Manual (WHC-CM-3-10), the WHC Quality Assurance Manual (WHC-CM-4-2) and the WHC Engineering Practices Guidelines (WHC-IP-1026).

5.2 Schedule for Corrective Actions

The schedule for the completion of identified corrective actions is provided in Table 1. The table contains a brief description of the corrective action activity and applicable milestones; the responsible person for each activity/milestone; and the estimated start and completion dates for each activity/milestone.

6.0 JUSTIFICATION FOR APPROVAL

The identified S/RID implementation discrepancy is necessary to update forms and procedures to provide clear direction concerning incorporation of special requirements for data security in established databases. The proposed corrective action will be completed at the next revision cycle as indicated in Table 1. The discrepancy does not involve a safety-related compliance issue, nor does it affect the ability of WHC to demonstrate compliance with regulatory requirements. As result, no potential legal actions or other adverse safety impacts are anticipated during the period of noncompliance and no compensatory action is necessary.

WHC-TFO-CM-002
September 23, 1996

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7.0 RESOURCE IMPACTS

The proposed schedule for corrective action will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

Table 1 - Schedule for Corrective Actions

DOE-RL Approval _____ Date _____

WHC-TFO-CM-002
 September 23, 1996

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Table 1: Schedule for Corrective Actions

Requirement	Planned Corrective Action	Start Date	End Date	Responsible Organization
DOE-STD-1073-93 Chapter 2, Section 2.1.3, Paragraph 7 Sentence 2	Revise WHC-CM-3-5 Document Control and Record Management Manual, WHC-CM-3-10 Software Practices, WHC-CM-4-2 WHC Quality Assurance Manual, WHC-CM-6-1 Standard Engineering Practices, and WHC-IP-1026 Engineering Practices Guidelines, to add sections on data security in established databases.	10/1/96	9/30/97	Org. Codes; CM-3-5, N7A00, Records/Planning Services; CM-3-10, 62000, Facilities Systems Support; CM-4-2, 38000, Quality Assurance; CM-6-1 & IP-1026, 78110, Configuration Management/Maintenance Programs

Training & Qualification

Attachment 3

Date: September 25, 1996
TO: Cynthia Day-Phalen
FROM: Tony L. Jennings
Subject: S/RID Phase I Report Resolution
Compliance Schedule Approval Request

The Training and Procedures Group had eleven (11) discrepancies identified in its S/RID Phase I Report. Each item has been resolved; therefore, a Compliance Schedule Approval Request IS NOT necessary for the Training and Procedures S/RID.

The following describes the discrepancies and action taken for resolution.

1) Sub-Element - 4.2.8.1 - Testing

Discrepancy: An exemption allowance/statement for examination preparers is not included in WHC-IP-0842, Vol III.

Resolution: Exemption statement for examination preparers added to WHC-IP-0842, Vol III, Section 7.8 "Conduct of Operator Continuing Training".

Date Completed: 09/16/96

2) Sub-Element - 4.2.8.2 - Qualification and Requalification

Discrepancy: The continuing training criteria is not listed in WHC-IP-0842, Vol III, Section 10.4 "Operations Engineer Training Program", paragraph 5.4.

Resolution: WHC-IP-0842, Vol III, Section 10.4 "Operations Engineer Training Program", was updated to include the continuing training program criteria.

Date Completed: 08/07/96

3) Sub-Element - 4.2.10 - Extension, Exceptions, and Alterations

Discrepancy: Currently there is no language covering challenge examinations included in WHC-IP-0842, Vol III, Section 7.3 "Conduct of Written Examinations".

Resolution: Language covering challenge examinations added to WHC-IP-0842, Vol III, Section 7.3 "Conduct of Written Examinations".

Date Completed: 09/16/96

4) Sub-Element - 4.3.2 - Maintenance Training Program

Discrepancy: A course in Root-Cause Analysis is not included as part of WHC-IP-0842, Vol III, Section 10.6 "Maintenance Training Program".

Resolution: This item was never discrepant. A Root-Cause Analysis course is part of WHC-IP-0842, Vol III, Section 10.4 "Operations Engineer/Shift Operations Engineer Training", which addresses the requirement.

5) Sub-Element - 4.5 - Accreditation

Discrepancy: Training & Procedures currently does not have a procedure for Accreditation.

Resolution: Accreditation is currently on indefinite HOLD by the DOE Washington D.C. For this reason, DOE-RL has notified Tank Farm Training & Procedures to suspend any Accreditation activity. No action required at this time.

Please contact either myself or Joe Cuneo if there are any questions in this matter.

Emergency Preparedness

Attachment 4

**Westinghouse
Hanford Company**

**Internal
Memo**

From: Procedures
Phone: 376-9870 R2-82
Date: September 25, 1996
Subject: COMPLIANCE SCHEDULE APPROVAL

77730-96-004

To: C. L. Day-Phalen R2-52
cc: RJS File/LB

Attached are the 25 Compliance Schedule Approval (CSA) approval forms for Tank Farms Emergency Management Standards/Requirements Identification Document (S/RIDs).

As outlined in the CSAs, the discrepant items have all been incorporated into the Tank Waste Remediation System (TWRS) Emergency Preparedness Program Plan (WHC-IP-0971), which is out for review and approval at this time, with an estimated completion date of October 30, 1996. Once the TWRS Emergency Preparedness Program Plan is approved, the CSAs will be reassessed and closed out.

None of the discrepant items are a risk to workers, the public or the environment, as the requirements are actually implemented for Tank Farms. The discrepancies pertain to Emergency Management requirement directives specifically for Tank Farms that are missing from Tank Farm documents.

R. J. Shupe
R. J. Shupe
R. J. Shupe
Manager

sah

Attachments

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-001**

<u>D.J. Kusler</u> Originator	<u>9-25-96</u> Date
<u>Les. Lehman FOR RIS</u> Reviewer	<u>9/25/96</u> Date
<u>Les. Lehman FOR RIS</u> Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

10CFR835 Part 1302(e). Each individual selected shall be trained in accordance with § 835. and briefed beforehand of the known or anticipated hazards to which the individual will be subjected.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms by use of the Emergency Response Team Briefing Form, which ensures responders are properly qualified (trained), have exposure capabilities, fit to perform the task, properly equipped, have correct dosimetry, and are briefed on the task, location of task, known or anticipated hazards, exposure limits, methods of monitoring the hazard, etc. This form is part of the Emergency Response Guide "B" - Event Command and Control, found in WHC-IP-1178, Tank Farms Event Response Manual, and is used by the Tank Farms emergency response organization personnel.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 4.0, Protective Actions, Subsection 9.0, Emergency Personnel Exposure.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 4.0, Protective Actions, Subsection 9.0, Emergency Personnel Exposure. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per the Emergency Response Team Briefing form, and Emergency Response Guide "B" - Event Command and Control found in WHC-IP-1178, Tank Farms Event Response Manual.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

Copy of the Emergency Response Team Briefing Form.

DOE-RL Approval

Date

EMERGENCY TEAM BRIEFING FORM

Revision

Rev. 0

3

Ref: WHC-IP-1178, Emergency Response Guide "B" - Event Command

Effective Date

6-5-96

I. INITIATING A N EMERGENCY RESPONSE TEAM

TEAM IDENTIFICATION:

Date:

Facility:

Destination:

Task Description:

RESPONSE TEAM

Type	Discipline				Number
Operators	<input type="checkbox"/> NPO <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Power Operator	<input type="checkbox"/> 204-AR Operator	<input type="checkbox"/> 242-A Operator	
Craft Maintenance	<input type="checkbox"/> Electrician <input type="checkbox"/> Welder <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Millwright <input type="checkbox"/> Rigger	<input type="checkbox"/> Instrument Tech. <input type="checkbox"/> Boilermaker	<input type="checkbox"/> Pipefitter	
Radiological Control	<input type="checkbox"/> HPTs				
Other (specify)					

RADIOLOGICAL REQUIREMENTS

(Obtain from Radiological Officer)

General Area: Dose Rate _____mR/hr

EMERGENCY DOSE EXTENSIONS: No Yes -

Complete Emergency Dose Extension Form

Team Exposure Limits

Protective Equipment

Task Limit	Turnback Value	PPEs	Dosimetry	Respiratory	Cartridge Type
		<input type="checkbox"/> One Pair <input type="checkbox"/> Two Pair <input type="checkbox"/> Plastics <input type="checkbox"/> Other (specify)	<input type="checkbox"/> TLDs <input type="checkbox"/> Pencil <input type="checkbox"/> Extremities <input type="checkbox"/> Multiple (specify)	<input type="checkbox"/> APR <input type="checkbox"/> PAPP <input type="checkbox"/> SCBA <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Particulate <input type="checkbox"/> Fumes/Vapors <input type="checkbox"/> Other (specify)

Turnback Value Detection Method: Individual Team Member (Pencil readings) HPT Monitor Time Keeper

HAZARDOUS MATERIALS REQUIREMENTS

(Obtain from Industrial Hygienist or Radiological Officer)

Produce Name:

IDLH: _____ ppm

Team Exposure Limits

Protective Equipment

Task Limit	Turnback Value	PPEs	Respiratory	Cartridge Type
		<input type="checkbox"/> Rain Gear <input type="checkbox"/> Acid Gear <input type="checkbox"/> Other (specify)	<input type="checkbox"/> APR <input type="checkbox"/> SCBA <input type="checkbox"/> Other (specify)	<input type="checkbox"/> Fumes/Vapors <input type="checkbox"/> Other (specify)

TURNBACK VALUE: Level _____ ppm

Detection Method: _____

TURN OVER

EQUIPMENT / COMMUNICATIONS

<p>EQUIPMENT (Required to perform task)</p> <p>In Explosive Atmosphere USE Explosive Proof Tools and Equipment</p>	<p>COMMUNICATIONS</p> <p>2-Way Radios: <input type="checkbox"/> No <input type="checkbox"/> Yes - Channel No: _____</p> <p>Cellular Phone: <input type="checkbox"/> No <input type="checkbox"/> Yes - Phone No: _____</p> <p>Other (specify): _____</p>
--	--

Plan/Team Approval _____ Telecon Approval Date/Time _____
 Building Emergency Director: _____

II. ASSEMBLE TEAM

Team Members	Year-to-Date Radiological Exposure <small>Provided by team members or from ACES.</small>	Team Members	Year-to-Date Radiological Exposure <small>Provided by team members or from ACES.</small>
Team Leader			

NOTE: Document additional team members on another Emergency Team Briefing Form.

III. DISPATCH AND MONITOR TEAM

Approval to dispatch team _____ Telecon Approval Date/Time _____
 Building Emergency Director: _____

DOCUMENT team exposure on the emergency tracking form.

IV. TEAM DEBRIEFING

Debriefed by: _____ Time: _____ Time Team Returned: _____

Current Status: Task Completed: No Yes

Observed Abnormal Radiological Conditions: No Yes - Description: _____

Observed Personnel Hazards (i.e., steam, water, electrical, hazardous materials, etc.): No Yes
 Description: _____

BED Review: _____ Time: _____

Radiological Officer Review: _____ Time: _____

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

9-25-96

WHC-TFO-EM-002

<u>D.J. Bowler</u>	<u>9-25-96</u>
Originator	Date
<u>W.J. Johnson for RJS</u>	<u>9/25/96</u>
Reviewer	Date
<u>[Signature]</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

29CFR1910 Part 120(p)(7)(i). New employees. The employer shall develop and implement a training program, which is part of the employer's safety and health program, for employees exposed to health hazards or hazardous substances at TSD operations to enable the employees to perform their assigned duties and functions in a safe and healthful manner so as not endanger themselves or other employees. The initial training shall be for 24 hours and refresher training shall be for eight hours annually. Employees who have received the initial training required by this paragraph shall be given a written certificate attesting that they have successfully completed the necessary training.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through, Hanford General Employee Training (HGET), New Employee (Tank Farms) Orientation and the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060. Also, workers classified as hazardous waste workers complete the Hazardous Workers training which is either a 40 hours class (actual workers) or the 24 hours class (non-workers). In addition there is a requirement to complete radiation worker training for personnel who enter radiation areas.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96

WHC-TFO-EM-003

<u><i>D.J. Rowland</i></u> Originator	<u>9-25-96</u> Date
<u><i>W.F. Schuman</i> BRWS</u> Reviewer	<u>9/25/96</u> Date
<u><i>[Signature]</i></u> Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

29CFR1910 Part 120 (p)(7)(ii). Current employers who can show by an employee's previous work experience and/or training that the employee has had training equivalent to the initial training required by this paragraph, shall be considered as meeting the initial training requirements of this paragraph as to that employee. Equivalent training includes the training that existing employees might have already received from actual site work experience. Current employees shall receive eight hours of refresher training annually.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through, Hanford General Employee Training (HGET), New Employee (Tank Farms) Orientation and the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060. Also, workers classified as hazardous waste workers complete the Hazardous Workers training which is either a 40 hours class (actual workers) or the 24 hours class (non-workers). In addition there is a requirement to complete radiation worker training for personnel who enter radiation areas. Refresher training (required annually) is required for all current employees who would require this type of training, which includes radiation worker training, hazardous worker training (8 hours), HGET, and the Facility Emergency and Hazards Information Checklist training.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the Hanford General Employee Training (HGET), New Employee (Tank Farms) Orientation and the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060. Also, workers classified as hazardous waste workers complete the Hazardous Workers training which is either a 40 hours class (actual workers) or the 24 hours class (non-workers). In addition there is a requirement to complete radiation worker training for personnel who enter radiation areas. The TWRS Facility Emergency and Hazards Information Checklist Training consists of program information, emergency notification systems, emergency equipment, emergency response process/priorities, emergency response organization, event classification, event command and control, personnel protective actions, and emergency response.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-005

<u>D. J. Rozalul</u>	<u>9-25-96</u>
Originator	Date
<u>W. J. Lehman BCRIS</u>	<u>9/25/96</u>
Reviewer	Date
<u>[Signature]</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

28CFR1910 Part 120(p)(8)(iii)(B). Employee members of TSD facility emergency response organizations shall be trained to a level of competence in the recognition of health and safety hazards to protect themselves and other employees. This would include training in the methods used to minimize the risk of safety and health hazards; in the safe use of control equipment; in the selection and use of appropriate personnel protective equipment; in the safe operating procedures to be used at the incident scene; in the appropriate response to over exposure from health hazards or injury to themselves and other employees; and in the recognition of subsequent symptoms which may result from over exposures.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Training is provided to Tank Farms personnel which implement this requirement, but has been in a unformalized, non-standardize method. Training has been developed that formalizes and standardizes this training and is to be implemented in October 1996. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060. The TWRS Facility Emergency and Hazards Information Checklist Training consists of program information, emergency notification systems, emergency equipment, emergency response process/priorities, emergency response organization, event classification, event command and control, personnel protective actions, and emergency response.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRs Emergency Preparedness Program Plan, in Section 9.0, TWRs Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SR1D-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96

WHC-TFO-EM-006

<u>D.J. Kozal</u> Originator	<u>9-25-96</u> Date
<u>W.J. Lehman FOR RIS</u> Reviewer	<u>9/25/96</u> Date
<u>[Signature]</u> Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

28CFR1910 Part 120(p)(8)(iii)(C). The employer shall certify that each covered employee has attended and successfully completed the training required in paragraph (p)(8)(iii) of this section, or shall certify the employee's competency at least yearly. The method used to demonstrate competency for certification of training shall be recorded and maintained by the employer.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWR5 Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Training is provided to Tank Farms personnel which implement this requirement, but has been in a unformalized, non-standardize method. Training has been developed that formalizes and standardizes this training and is to be implemented in October 1996. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060, and other training courses that address facility hazards and response information. This training is required on an annual bases. This training is documented on the Facility Emergency and Hazards Information Checklist (form number A-6000-784).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-007

<u>D.J. Rowland</u> Originator	<u>9-25-96</u> Date
<u>W.J. Schuman FORRIS</u> Reviewer	<u>9/25/96</u> Date
<u>[Signature]</u> Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

29CFR1910 Part 120(q)(6).

Training. Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following paragraphs:

(i) First responder awareness level. First responder at the awareness level are individual who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the authorities of the release. First responder at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

(A) An understanding of what hazardous substances are, and the risks associated with them in an incident.

(B) An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.

(C) The ability to recognize the presence of hazardous substances in an emergency.

(D) The ability to identify the hazardous substances, if possible.

(E) An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.

(F) The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.

(ii) First responder operations level. First responder at the operations level are individual who respond to releases or potential releases of hazardous substances as part of the initial responder to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify:

(A) Knowledge of the basic hazard and risk assessment techniques.

(B) Know how to select and use proper personal protective equipment provided to the first responder operational level.

(C) An understanding of basic hazardous materials terms.

(D) Know how to perform basic control, containment and/or confinement operations within the capabilities of the resource and personal protective equipment available with their unit.

(E) Know how to implement basic decontamination procedures.

(F) An understanding of the relevant standard operating procedures and termination procedures.

(iii) Hazardous material technician. Hazardous material technicians are individual who respond to release or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

(A) Know how to implement the employer's emergency response plan.

(B) Know the classification, identification and verification of known or unknown material by using field survey instruments and equipment.

(C) Be able to function within as assigned role in the Incident Command System.

(D) Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous material technician.

(E) Understand hazards and risk assessment techniques.

(F) Be able to perform advance control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available within the unit.

- (G) Understand and implement decontamination procedures.
- (H) Understand termination procedures.
- (I) Understand basic chemical and toxicological terminology and behavior.

(iv) Hazardous material specialist. Hazardous material specialists are individual who respond with and provide support to hazardous material technicians. Their duties parallel those of the hazardous material technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities. Hazardous material specialists shall have competency in the following areas and the employer shall so certify:

- (A) Know how to implement the local emergency response plan.
 - (B) Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
 - (C) Know the state emergency response plan.
 - (D) Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
 - (E) Understand in-depth hazard and risk techniques.
 - (F) Be able to perform specialized control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available.
 - (G) Be able to determine and implement decontamination procedures.
 - (H) Have the ability to develop a site safety and control plan.
- (v) On scene incident commander. Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have the competency in the following areas and the employer shall so certify:
- (A) Know and be able to implement the employer's incident command system.
 - (B) Know how to implement the employer's emergency response plan.
 - (C) Know and understand the hazards and risk associated with employees working in chemical protective clothing.
 - (D) Know how to implement the local emergency response plan.
 - (E) Know of the state emergency response plan and the Federal Regional Response Team.
 - (F) Know and understand the importance of decontamination procedures.
 - (H) Understand termination procedures.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Training is provided to Tank Farms emergency response personnel, (i.e. initial responders and emergency response organization members) which implement this requirement, but has been in a unformalized, non-standardize method. Training has been developed that formalizes and standardizes this training and is to be implemented in October 1996. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number 03E060, and other training courses that address facility hazards and response information. This training is required on an annual bases. This training is documented on the Facility Emergency and Hazards Information Checklist (form number A-6000-784). Specific emergency response action training has been provided using the written response procedures, emergency plans and drills.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

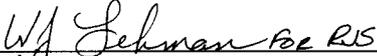
Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

9-25-96

WHC-TFO-EM-008

 _____ Originator	9/25/96 _____ Date
 _____ Reviewer	9/25/96 _____ Date
 _____ Approval	9/21/96 _____ Date

1.0 REQUIREMENT

29CFR1910 Part 120 (q)(8). Refresher Training.

(i) Those employees who are trained in accordance with paragraph (q)(6) of this section shall receive annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly.

(ii) A statement shall be made of the training or competency, and if a statement of competency is made, the employer shall keep a record of the methodology used to demonstrate competency.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Training is provided to Tank Farms emergency response personnel, (i.e. initial responders and emergency response organization members) which implement this requirement, but has been in a unformalized, non-standardize method. Training has been developed that formalizes and standardizes this training and is to be implemented in October 1996. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. Refresher training is implemented at Tank Farms, which meets this requirement. Training includes the Facility Emergency and Hazards Information Checklist (building emergency plan review training) course number O3E060, participation in quarterly facility emergency drills, and OJT (one-on-one) training throughout the year on changes to response plans and procedures.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, TWRS Emergency Response Training, Subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Control Face (Public) Form

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-009**

<u>D.J. Randal</u>	<u>9-25-96</u>
Originator	Date
<u>W.J. Lehman FOR RJS</u>	<u>9/25/96</u>
Reviewer	Date
<u>[Signature]</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

29CFR1910 Part 120(q)(9)(ii). Any emergency response employees who exhibits signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency incident, either immediately or subsequently, shall be provided with medical consultation as required in paragraph (f)(3)(ii) of this section.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. This requirement is implemented at Tank Farms facilities through the Emergency Response Guide "A" - Initial Response, found in WHC-IP-1178, which instructs the Building Emergency Director to ensure injured or exposed personnel are properly taken care of such as, medical assistance, decontamination, etc.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 4.0, Protective Actions, Subsection 9.0, Emergency Personnel Exposure.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 4.0, Protective Actions, Subsection 9.0, Emergency Personnel Exposure. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0010**

D.J. Kukul 9-25-96
Originator Date

W.J. Lehman BERRIS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

29CFR1910 Part 120(q)(11).

(i) Meet all the requirements of paragraphs (b) through (o) of this section;
or

(ii) Where the clean-up is done on plant property using plant or workplace employees, such employees shall have completed the training requirements of the following: 29CFR1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training made necessary by the tasks they are expected to be performed such as personal protective equipment and decontamination procedures. All equipment to be used in the performance of the clean-up work shall be in serviceable condition and shall have been inspected prior to use.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. This requirement is implemented at Tank Farms facilities through the Emergency Response Guide "B" - Event Command and Control, found in WHC-IP-1178, through the use of the Emergency Response Team Briefing form. The form ensures responders meet the qualification requirements for the task to be performed, and are fit to perform the task, and that the responders are properly equipped, aware of the hazards, know their exposure limits and wear proper protective clothing, and that the proper equipment is available and serviceable.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, Emergency Response Training, subsection 3.0, Requirements.

Incorporate the requirement statement pertaining to emergency equipment serviceability into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 7.0, Emergency Facilities and Equipment, subsection 10.1, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, Subsection 3.0, Requirements, and Section 7.0, Emergency Facilities and Equipment, subsection 10.1, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

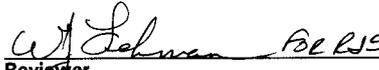
DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0011**

 Originator	<u>9-25-96</u> Date
 Reviewer	<u>9/25/96</u> Date
 Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

29CFR1910 Part 165(b)(4). Employee Alarm Systems. General requirements. The employer shall explain to each employee the preferred means of reporting emergencies, such as manual pull box alarms, public address systems, radio or telephones. The employer shall post emergency telephone numbers near telephones, or employee notice boards, and other conspicuous locations when telephones serve as a means of reporting emergencies. Where a communication system also serves as the employee alarm system, all emergency messages shall have priority over all non-emergency messages.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. Tank Farms provides alarm training and preferred methods of reporting emergency information through HGET, Tank Farms Orientation and the Facility Emergency and Hazardous Information Checklist training (course number 03E060). Emergency phone number 911 is posted throughout Tank Farm facilities on Non-Hazardous Facilities Emergency Response Information wallboards, and Hazardous Facilities Emergency Response Center (information wallboards).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWR Emergency Preparedness Program Plan, in Section 6.0, Notifications and Communications, subsection 10.4., Emergency Alarms.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 6.0, Notifications and Communications, subsection 10.4, Emergency Alarms. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0012

W.J. Roulal 9-25-96
Originator Date

W.J. Lehman For RIS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5482.1B Section 9.a(5). The appraised organization shall respond to appraisal reports within 30 days to receipt and indicate what corrective actions will be taken.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. Finding with a high Priority Planning Grid (PPG) value, for conditions that are unsafe to workers, public or the environment receive immediate attention. There are no HATs findings against TWRS Emergency Management at this time.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 12.0, Program Administration, subsection 6.1, Responsibilities.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 12.0, Program Administration, subsection 6.1, Responsibilities. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval **Date**

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SR1D-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0013

<u>W. J. Paulson</u>	<u>9-25-96</u>
Originator	Date
<u>W. J. Lehman for RS</u>	<u>9/25/96</u>
Reviewer	Date
<u>W. J. Lehman for RS</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

DOE5482.1B Section 9.a(7). Follow up visits by a management representative may be required for the purpose of discussing the adequacy of corrective action and whether additional action is necessary. These discussions shall be confirmed in writing and, where no additional action is necessary, shall constitute formal closeout of the appraisal.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. Finding with a high Priority Planning Grid (PPG) value, for conditions that are unsafe to workers, public or the environment receive immediate attention. There are no HATS findings against TWRS Emergency Management at this time.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 12.0, Program Administration, subsection 6.1, Responsibilities.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 12.0, Program Administration, subsection 6.1, Responsibilities. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0014

D. J. Boudal 9-25-96
Originator Date

W. J. Gebner BE RIS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(a). Alert. Declaration of an Operational Alert requires the availability of personnel and resources to:

- 1 Provide continuous assessment of pertinent information for DOE decision makers, offsite authorities, the public, and other appropriate entities.
- 2 Conduct appropriate assessments, investigations, or preliminary or confirmatory sampling and monitoring.
- 3 Mitigate the severity of the occurrence or its consequences, and

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SR10-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0015

D.J. Rowland 9-25-96
Originator Date

W.J. Lehman FOR RIS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(a)4d. Safeguards and Security. An Alert shall be declared when events are in progress, have occurred, or are anticipated which could involve an actual or potential substantial degradation in the level of protection of the facility or the loss of possible Special Nuclear Material (SNM). Pre-emergency conditions which warrant increased safeguards and security measures shall be reported in accordance with DOE 5000.3A, Attachment 2 Group 5, procedures for non-emergency occurrences.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition Tank Farms uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classification Emergencies", which contain identified, credible security contingencies in the form of Emergency Action Levels.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0016**

<u>D. J. Roubal</u>	<u>9-25-96</u>
Originator	Date
<u>W. J. Lehman FOR RUS</u>	<u>9/25/96</u>
Reviewer	Date
<u>[Signature]</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(a)4e. Transportation. An Alert shall be declared when events are in progress or have occurred which involve an actual or potential substantial degradation of the safety of the shipment. Any release of hazardous materials (radiological or non-radiological) is expected to be limited to small fractions of the appropriate PAG or ERPG exposure levels.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition Tank Farms uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classification Emergencies", which contain identified, credible transportation accidents in the form of Emergency Action Levels.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.1, Alert Level Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0017

D. J. Prudal 9-25-96
Originator Date

W. J. Lehman For RIS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(b). Site Area Emergency. Declaration of an Operational Site Area Emergency requires initiation of predetermined protective actions for onsite personnel and the notification and assembly of emergency response personnel and equipment to activate response centers to provide:

- 1 Continuous assessment of pertinent information for DOE decision makers, offsite authorities, and other appropriate entities;
- 2 Establish communications, consultation, and liaison with offsite authorities.
- 3 Provide information to the public through offsite authorities and the media;
- 4 Conduct or assist in any evacuations and sheltering;

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96

WHC-TFO-EM-0018

<u>D.J. Krolak</u>	<u>9-25-96</u>
Originator	Date
<u>W.J. Lehman for RJS</u>	<u>9/25/96</u>
Reviewer	Date
<u>[Signature]</u>	<u>9/27/96</u>
Approval	Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(b)7.d. Safeguards and Security. A Site Area Emergency shall be declared when events are in progress or have occurred which involve actual or malevolent acts resulting in major failures of protective systems.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition, the Tank Farm uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classifying Emergencies," which contains identified, credible security contingencies in the form of Emergency Action Levels (EALs).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0019

<u>D.J. Probst</u> Originator	<u>9-25-96</u> Date
<u>W.J. Lehman FOR BIS</u> Reviewer	<u>9/25/96</u> Date
<u>[Signature]</u> Approval	<u>9/27/96</u> Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(b)7.e. Transportation. A Site Area Emergency shall be declared when events are in progress or have occurred which involve an actual or potential major reduction in the safety of the shipment. Any release of hazardous materials (radiological or non-radiological) is expected to exceed appropriate PAG or ERPG exposure levels in the immediate vicinity of the accident or incident but is not expected to exceed the appropriate PAG or ERPG in a general public area.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition, the Tank Farm uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classifying Emergencies," which contains identified, credible transportation accidents in the form of Emergency Action Levels (EALs).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.2, Site Area Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0020

D.J. Rowland 9-25-96
Originator Date

W.J. Lehman FOR RJS 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(c). General Emergency. Declaration of an Operational General Emergency requires the notification, mobilization, and dispatch of all appropriate emergency response personnel and equipment including appropriate DOE national response assets to:

- 1 Activate the response centers and other emergency assets to provide continuous assessment of information;
- 2 Establish communications, consultation, and liaison with offsite authorities and recommend predetermined protective actions for the public;
- 3 Provide information to the public through offsite authorities and the media;
- 4 Conduct or assist in any evacuations;
- 5 Conduct appropriate assessments, investigations, or sampling and monitoring;
- 6 Mitigate the severity of the actual or potential consequences; and
- 7 Mobilize and dispatch appropriate emergency response groups or security forces.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRs Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRs Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

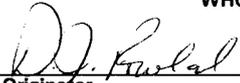
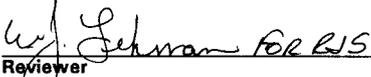
Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SRID-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0021

 _____ Originator	9-25-96 _____ Date
 _____ Reviewer	9/25/96 _____ Date
 _____ Approval	9/27/96 _____ Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(c)7.d. Safeguards and security. A General Emergency shall be declared when events are in progress of have occurred which involve malevolent acts resulting catastrophic degradation of protective systems that could lead to substantial offsite impacts.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition, Tank Farms uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classifying Emergencies," which includes security contingencies in the form of Emergency Action Levels (EALs).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

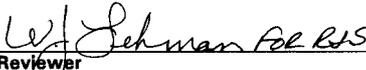
DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0022**

 _____ Originator	<u>9-25-96</u> _____ Date
 _____ Reviewer	<u>9/25/96</u> _____ Date
 _____ Approval	<u>9/27/96</u> _____ Date

1.0 REQUIREMENT

DOE5500.2B Section 11.a(2)(c)7.e. Transportation. A General Emergency shall be declared when events are in progress or have occurred which involve actual or imminent catastrophic reduction in the safety of the shipment. Any releases of hazardous materials (radiological or non-radiological) is expected to exceed appropriate PAG or ERPG exposure levels in the general public area. If the event has occurred on a DOE site, the release is expected to exceed appropriate PAG or ERPG exposure levels offsite.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWR5 Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirements of this DOE Order are implemented at Tank Farms through Emergency Response Guide "A" - Initial Response, and Emergency Response Guide "B" - Event Command and Control. These two procedures instruct the Building Emergency Director to ensure the requirements stated in this DOE Order are implemented. In addition, Tank Farms uses WHC-CM-4-43, Emergency Management Procedures, Section 2.1A, "200 Area Tank Farms Recognizing and Classifying Emergencies," which includes security contingencies in the form of Emergency Action Levels (EALs).

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRs Emergency Preparedness Program Plan, in Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 3.0, Consequence Assessment and Event Classification, subsection 4.3, General Emergency Classification. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

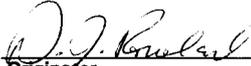
Date

STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES

WHC-SD-TWR-SR1D-002
September 30, 1996
Rev. 0

Compliance Schedule Approval Form

9-25-96
WHC-TFO-EM-0023


Originator 9-25-96
Date


Reviewer 9/25/96
Date


Approval 9/27/96
Date

1.0 REQUIREMENT

DOE5500.3A Section 11.c(11)(b)(1). All training must be systematic and performance based, i.e., based on an analysis of tasks to be performed during an emergency, and developed with performance objectives, emphasis on team training, and facility-specific emergency response scenarios.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Training is provided to Tank Farms personnel which implements this requirement, but has been in a unformalized, non-standardized method. Training has been developed that formalizes and standardizes this training and is to be implemented in October 1996. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through Hanford General Employee Training (HGET), New Employee (Tank Farms) Orientation, and the Facility Emergency and Hazards Information Checklist Training (course number 03E060). Tank Farms emergency response organization members have been trained in a OJT format, consisting of emergency procedures and round-table drill scenarios based on identified event that may occur at Tank Farms.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 9.0, Emergency Response Training, subsection 3.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 9.0, Emergency Response Training, subsection 3.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0024**

D.J. Powell 9-25-96
Originator Date

W.J. Dehman 9/25/96
Reviewer Date

W. J. Dehman 9/27/96
Approval Date

1.0 REQUIREMENT

DOE550.3A Section 11.c.(12)(d). Drills and Exercises. A coordinated program of drills and exercises must be an integral part of emergency management program as follows:

Each member of the emergency response organization shall participate in a drill or exercise at least annually to demonstrate proficiency in assigned response duties and responsibilities.

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRs Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. Tank Farms has had a no going drill program since 1994. The program tracks each emergency response organization member to ensure they participate in at least one drill or exercise (as a participant, controlled, evaluator). No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the Facility Emergency Drill Program, in WHC-IP-0971, TWRs Emergency Preparedness Program Plan. Only exception is the this missing requirement statement.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRs Emergency Preparedness Program Plan, in Section 10.0, Facility Emergency Drill Program, subsection 2.0, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 10.0, Facility Emergency Drill Program, subsection 2.0, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

**STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT
ASSESSMENT NONCOMPLIANCES**

Compliance Schedule Approval Form

**9-25-96
WHC-TFO-EM-0025**

D.J. Boudal 9-25-96
Originator Date

W.J. Schuman 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

DOE5500.3A Section 11.d.(1). Documentation. PSOs, Head of Field Elements, and all managers/administrators of a DOE- or contractor-operated facility shall develop and maintain an emergency plan and associated procedures to document their emergency management program. These documents must be controlled distribution documents. The documentation shall include:

An emergency plan which describes the provisions for response to an operational emergency.

(a) The plan must contain information to describe each element of the emergency management program, describes the overall picture of emergency response capabilities, and include material necessary for the understanding of the plans (e.g., diagrams, illustrations, maps, and transportation routes). The emergency plan must reference procedures and support material (i.e., PRAs, MSSAs, EAs, EISs, etc.) which may be used by emergency response personnel.

(b) The emergency plan must describe the EPZs applicable to the facility to include topographical features, demographic information, transportation routes, land use, major industrial facilities, public facilities, and jurisdictional boundaries.

(c) The emergency plan must be consistent with other plans for similar DOE facilities and coordinated and compatible with other applicable DOE, Federal, state, tribal, and local emergency plans. The emergency plan must integrate the response plans for specific incidents (e.g., fire, medical, security, and

2.0 NONCOMPLIANCE

This requirement is missing from the program document, WHC-IP-0971, TWRS Emergency Preparedness Program Plan, which establishes the requirements for the emergency management program. The recently revised Tank Farms Building Emergency Plan WHC-IP-0263-TF, contains these requirements. No occurrence report has been written.

3.0 RISK

There is no risk to the workers, public or the environment from the noncompliance of this requirement. The requirement is implemented at Tank Farms through the revised Tank Farms Building Emergency Plan WHC-IP-0263-TF.

4.0 COMPENSATORY MEASURES

As stated in 3.0, Risk, no compensatory measures are required. The requirement is implemented at Tank Farm facilities, but is not stated in the program manual that established the program requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Incorporate this requirement statements pertaining to training requirements into the WHC-IP-0971, TWRS Emergency Preparedness Program Plan, in Section 8.0, Emergency Plans and Procedures, subsection 1.1, Requirements.

5.2 Schedule for Corrective Actions

The requirement has been incorporated into the revised WHC-IP-0971, Emergency Preparedness Program Plan, into Section 8.0, Emergency Plans and Procedures, subsection 1.1, Requirements. Plan has been issued for review and approval with an ECD of 10-30-96.

6.0 JUSTIFICATION FOR APPROVAL

The noncompliance issue is with the program requirement manual. The requirement is implemented at Tank Farm facilities per training stated in 3.0, Risk.

7.0 RESOURCE IMPACTS

There are no resource impacts. The requirement has already been incorporated into the program plan, and is already implemented at Tank Farm facilities.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

Construction

Attachment 5

Compliance Schedule Approval Request

September 23, 1996
WHC-TFO-CS-001

Paul F. Schmitt 26 Sep 1996
Originator - PF Schmitt Date

Ronald F. Nelson 9/26/96
Reviewer - RL Nelson Date

JH Wicks 9/27/96
Approval - JH Wicks Date

1.0 REQUIREMENT

The Tank Farm Transition Project Standards/Requirements Identification Document Construction Functional Area identifies the following requirement regarding project cost estimating:

DOE5700.2D Preamble, Section 8.d

Check estimates are recommended for validating project estimates. Check estimates can be made by the project engineer/manager or by any qualified DOE or support contractor personnel. It is highly desirable that the check estimate be made by someone other than those who performed the original estimate. The check estimate may utilize any of the estimating methods shown in Attachment 1.

DOEN4700.5 Attachment 2, Section 2.a.(3)(b)1

Prepare cost estimates using appropriate estimating methodologies that are integrated with the WBS, and the DOE cost structure as specified by the DOE, for all contract work. Ensure that all estimates are consistent with DOE 5700.2D and in accordance with FAR 15.804, "Cost and Price Data Analysis, as applicable.

2.0 NONCOMPLIANCE

The noncompliance discovered during the Phase 1 assessment was related to inadequate incorporation of procedural controls for cost estimating on construction projects. The noncompliance is limited to Work Breakdown Structure cost integration and estimating methodologies and is considered administrative in nature and does not affect operational readiness. Because no major systems or activities are adversely affected, no occurrence reports are required.

3.0 RISK

There is no increased risk to the health and safety of the worker, the public, or the environment that is created by this noncompliance.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

The requirements for integration of cost estimating methodologies with DOE cost structures will be added to the Project Management Manual (WHC-CM-6-2). Appendix A, Project Data Sheets (PM-3A) item 10, Details of Cost Estimates, will be modified to add notation that cost estimates will be validated with check estimates, as required by DOE 5700.2D and FAR 15.804 "Cost and Price Data Analysis".

5.2 Schedule for Corrective Actions

The schedule for the completion of identified corrective actions is provided in Table 1. The table contains a brief description of the corrective action activity and applicable milestones; the responsible person for each activity/milestone; and the estimated start and completion dates for each activity/milestone.

6.0 JUSTIFICATION FOR APPROVAL

The identified S/RID implementation discrepancy is necessary to update forms and procedures to provide clear direction concerning incorporation of special requirements for cost estimating methodologies. The proposed corrective action will be completed at the next revision cycle as indicated in Table 1. The discrepancy does not involve a safety-related compliance issue, nor does it affect the ability of WHC to demonstrate compliance with regulatory requirements. As result, no potential legal actions or other adverse safety impacts are anticipated during the period of noncompliance and no compensatory action is necessary.

7.0 RESOURCE IMPACTS

The proposed schedule for corrective action will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

Table 1 - Schedule for Corrective Actions

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September 23, 1996

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September 23, 1996

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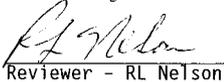
Table 1: Schedule for Corrective Actions

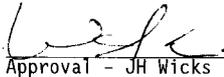
Requirement	Planned Corrective Action	Start Date	End Date	Responsible Organization
DOE5700.2D Preamble, Sec. 8.d	Revise Project Management Manual (WHC-CM-6-2), Appendix A, Project Data Sheets (PM-3A) item 10 to add notation that cost estimates will be validated with check estimates.	10/1/96	9/30/97	Org. Code 63347, Central Projects Systems
DOEN4700.5 Attachment 2, Section 2.a.(3)(b)1	Project Management Manual (WHC-CM-6-2), Appendix A, Project Data Sheets (PM-3A) item 10 to add reference to DOE5700.2D and FAR 15.804 for applicable cost estimating methodologies.	10/1/96	9/30/97	Org. Code 63347, Central Projects Systems

Compliance Schedule Approval Request

September 23, 1996
WHC-TFO-CS-002

 26 SEP 1996
Originator - PF Schmitt Date

 9/26/96
Reviewer - RL Nelson Date

 9/27/96
Approval - JH Wicks Date

1.0 REQUIREMENT

The Tank Farm Transition Project Standards/Requirements Identification Document Construction Functional Area identifies the following requirement regarding Construction Program controls:

DOE1324.2A Chapter V, Attachment V-14, item 2.d

Records selected for architectural, historical and technological significance (see notes at end of schedule for selection criteria). Permanent. Offer to NARA when file is inactive (See first paragraph of introduction to this schedule).

- (1) Project description, location, construction costs and performance schedules.
- (2) "As built" architectural and engineering drawings (selected to adequately depict the principal architectural and engineering features).
- (3) Photographs of completed project.
- (4) Construction Completion Reports

DOE6430.1A Section 0150-5, Sentences 1 thru 4

TEMPORARY SECURITY FENCING Prior to construction the following conditions and requirements for temporary security fencing shall be implemented:

- o Exclusion of unauthorized vehicular and pedestrian traffic from the construction site
- o Restriction of authorized vehicular traffic to designated access roads
- o Protection of construction materials and installed work

Temporary security fencing shall be installed, as required, at unsecured construction sites to prevent vandalism or theft. Temporary security fencing shall provide a level of integrity and a clear zone to suit site-specific conditions. Temporary security fencing shall be consistent with site-specific security and protection goals and operational requirements.

2.0 NONCOMPLIANCE

The noncompliance discovered during the Phase 1 assessment was related to inadequate incorporation of procedural control for inactive project records and temporary security fencing. Although existing procedures describe requirements for the identification, generation, classification, indexing, storage and disposition of project records, no specific requirements are defined for selecting records for architectural, historical, and technological significance prior to turnover to NARA. Similarly, although existing procedures address permanent structures, no specific requirements were identified specifically addressing temporary security fencing for construction projects. The noncompliance is considered administrative in nature and does not affect operational readiness. Because no major systems or activities are adversely affected, no occurrence reports are required.

3.0 RISK

There is no increased risk to the health and safety of the worker, the public, or the environment that is created by this noncompliance. Existing records management systems and security systems provide the necessary coverage of the requirement for permanent facilities.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

The requirements for review of inactive project records for architectural, historical, and technological significance prior to turnover will be added to Section 6.3 (Closing Files) of the Project Management Manual (WHC-CM-6-2). In addition, the requirements for temporary security fencing for construction projects will be added to Section 4.5 (Construction Control) of the Project Management Manual (WHC-CM-6-2).

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September 23, 1996

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5.2 Schedule for Corrective Actions

The schedule for the completion of identified corrective actions is provided in Table 1. The table contains a brief description of the corrective action activity and applicable milestones; the responsible person for each activity/milestone; and the estimated start and completion dates for each activity/milestone.

6.0 JUSTIFICATION FOR APPROVAL

The identified S/RID implementation discrepancy is necessary to update forms and procedures to provide clear direction concerning incorporation of special requirements for inactive records turnover and security fencing during construction projects. The proposed corrective action will be completed at the next revision cycle as indicated in Table 1. The discrepancy does not involve a safety-related compliance issue, nor does it affect the ability of WHC to demonstrate compliance with regulatory requirements. As result, no potential legal actions or other adverse safety impacts are anticipated during the period of noncompliance and no compensatory action is necessary.

7.0 RESOURCE IMPACTS

The proposed schedule for corrective action will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

Table 1 - Schedule for Corrective Actions

DOE-RL Approval Date

WHC-TFO-CS-002
 4 of 3
 September 23, 1996

Page

Table 1: Schedule for Corrective Actions

Requirement	Planned Corrective Action	Start Date	End Date	Responsible Organization
DOE1324,2A Chapter V, Attachment V-14, Item 2.d	Revise the Project Management Manual (WHC-CM-6-2), within Appendix A, Project Documentation Requirements (PM-12) to add to Section 6.3 (Closing Files) an item to review files for information as prescribed by this requirement.	10/1/96	9/30/97	Org. Code 63347, Central Projects Systems
DOE6430.1A Section 0150-5, Sentences 1 thru 4	Revise Project Management (WHC-CM-6-2), Section 4.5 Construction Control, to provide for temporary security fencing consistent with this requirement.	10/1/96	9/30/97	Org. Code 63347, Central Projects Systems

Operations

Attachment 6

**Westinghouse
Hanford Company**

**Internal
Memo**

From: East Tank Farms⁴ Transition Project 77100-96-088
Phone: 3-0132 S5-07
Date: September 26, 1996
Subject: DESCRIPTION AND CURRENT STATUS OF CONDUCT OF OPERATIONS, PHASE I
NONCOMPLIANCES

To: E. Biebesheimer R2-52
C. L. Day-Phalen R2-52

cc: J. G. Burton S7-01
J. E. Geary S5-07
D. P. Reber T4-07
WER:File/LB

The following information reiterates the non-compliances identified during the Phase I Standard Requirement Identification Document(s) assessment and the current status of each non-compliance.

ELEMENT 9.2 "SHIFT ROUTINES AND OPERATING PRACTICES"

REQUIREMENT: DOE 5480.19 Chapter II, Section C.3, Paragraph 1, Sentence 7-9.

The element is administratively discrepant because there are two implementing documents (T0-020-755 and WHC-IP-0842, Vol. II, Section 4.2.1) which both give guidance on how to deal with alarm status in slightly different ways. The operating procedures refer workers to the more detailed T0-020-755 procedure, so most employees use just the one procedure.

Corrective Action(s): Revise the WHC-IP-0842, Vol. II, Section 4.2.1 procedure to remove the alarm status guidance and insert a statement referring personnel to the T0-020-755 procedure for guidance.

Status: In approval process, will be completed September 30, 1996.

ELEMENT 9.6 "INVESTIGATION OF ABNORMAL EVENTS"

REQUIREMENT: DOE 5480.19 Chapter VI, Section C.3, Sentence 4 and 5.

The element is administratively discrepant because minimum investigator qualification's haven't been formally established in a procedure.

Corrective Action(s): Incorporate minimum training qualifications into WHC-CM-1-5 Section 7.1, and WHC-IP-0842, Vol. II, Section 4.6.2 procedures.

Status: In progress (See CSA: WHC-TWRS-CO-001)

ELEMENT 9.10 "INDEPENDENT VERIFICATION"

REQUIREMENT: DOE 5480.19 Chapter X, Section C.3, Sentence 5.

E. Biebesheimer, et al
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77100-96-088

The element is administratively discrepant because WHC-IP-0842 Vol. II, Section 4.10.1 is missing instructions for verifying solenoid-operated valves, removable links, and availability of control power. These instructions are discussed in the authorized worker training.

Corrective Action(s): Incorporate into the WHC-IP-0842 Vol. II, Section 4.10.1 instructions for solenoid-operated valves, removable links and fuses, and the availability of control power.

Status: In approval process, will be completed September 30, 1996.

ELEMENT 9.11 "LOGKEEPING"

REQUIREMENT: DOE 5480.19 Chapter XI, Section C.7.

The element is administratively discrepant because WHC-IP-0842, Vol. II, Section 4.11.1 doesn't identify who/where the logbooks should be turned over to for disposal. Current practices reflect that the logbooks are being turned over to the appropriate individuals.

Corrective Action(s): Revise the WHC-IP-0842, Vol. II, Section 4.11.1 procedure to incorporate record handling responsibilities and actions.

Status: Completed May 29, 1996

ELEMENT 9.12 "OPERATIONS TURNOVER"

REQUIREMENT: DOE 5480.19 Chapter XII, Section C.1.b, Paragraph 2, Sentence 3.

The element is administratively discrepant because the turnover sheets attached to the WHC-IP-0842, Vol. II, Section 4.12.1 do not provide for documentation of review of the roundsheets during shift turnover. Current practices reflect that roundsheets are discussed during turnover.

Corrective Action(s): On the shift turnover sheet the shift managers sign for review of equipment status sheets, and the operators sign for review of equipment status boards. The round sheets are the basis for the information identified in the equipment status sheets and on the equipment status boards. The round sheets are consulted during turnover for any questions or concerns with the equipment status. Attached to each round sheet is a signature page that requires each operator and shift manager to sign off that they have reviewed in depth each round sheet during their shift.

Status: Completed August 13, 1996

E. Biebesheimer, et al
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September 26, 1996

77100-96-088

If you have any questions regarding this issue, please contact C. A. Widhalm,
of my staff, on 376-1034.



W. E. Ross, Manager
East Tank Farms Transition Project

njm/hdb

Attachment

77100-96-088

Attachment

**COMPLIANCE SCHEDULE
APPROVAL REQUEST**

Consisting of 3 pages,
including cover page.

Compliance Schedule Approval Request

September 26, 1996
WHC-TWRS-CO-001


Originator - CA Widhalm 9-26-96
Date


Reviewer - WE Ross 9-26-96
Date


Approval - JH Wicks 9/27/96
Date

1.0 REQUIREMENT

The Tank Farm Transition Project Standards/Requirements Identification Document Conduct of Operations Functional Area identifies the following requirement as applicable to implementation assessments:

DOE-5480.19 Chapter VI, Section C.3, Sentence 4 and 5
Investigators should be trained in facility systems and operations and other major disciplines appropriate for the event under investigation. Additionally, investigators should be trained in techniques for conducting an investigation.

2.0 NONCOMPLIANCE

The noncompliance discovered during the Phase 1 assessment was related to inadequate identification of the minimum required training for personnel who perform event critiques, investigations, and root cause analyses.

3.0 RISK

There isn't an increased risk to the health and safety of the worker, the public, or the environment created by this noncompliance. There are informal standards currently being followed that identify management's expected minimum training requirements.

4.0 COMPENSATORY MEASURES

Because there is no increased risk to the health and safety of the worker, the public, or the environment, no compensatory measures are required.

WHC-TWRS-CO-001
September 26, 1996

Page 2 of 4

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

The informal minimum training requirements will be incorporated into WHC-IP-0842 Volume II Section 4.6.2.

5.2 Schedule for Corrective Actions

The schedule for completion of the identified corrective action is October 31, 1996.

6.0 JUSTIFICATION FOR APPROVAL

The identified S/RID implementation discrepancy needs to be formalized to ensure that the personnel performing duties involving critiques, investigations, and root causes are trained to an adequate standard. Currently all personnel are trained to the informal management standard, and the site wide manual governing occurrence reporting WHC-CM-1-5 Section 7.1, states that it is management's responsibility to ensure personnel are trained to an adequate minimum standard, based on a graded approach. Because of this there isn't any significant risk involved in remaining noncompliant during the month of October.

7.0 RESOURCE IMPACTS

The proposed schedule for corrective action will not impact current resource plans as the required procedure revisions will be accomplished during the normal procedure revision cycle.

8.0 LIST OF ATTACHMENTS

None

DOE-RL Approval _____ Date _____

Fire Protection and Occupational Safety and Health

Attachment 7

**Westinghouse
Hanford Company**

**Internal
Memo**

From: TWRS Safety 74G10-LMC-96-011
Phone: 372-2802 R3-01
Date: September 25, 1996
Subject: OSH AND FIRE PROTECTION S/RID PHASE I ASSESSMENT CORRECTIVE
ACTIONS

To: C. L. Day-Phalen R2-52
cc: E. Biebesheimer R2-52
K. M. Bowen R3-01
J. A. Ranschau R3-01
LMC/File/LB

The attached are Compliance Schedule Approval Forms (CSA) for discrepancies identified during the Phase I Assessment of the Fire Protection S/RID (Section 12) and the Occupational Safety and Health S/RID (Section 19).

Fire Protection

Two (2) discrepancies were identified during the Phase I assessment. Both discrepancies will be resolved with updates to the WHC-IP-0842 manual by September 30, 1997.

Occupational Safety and Health

Thirteen discrepancies were found in the assessment. Reevaluation determined that two (2) items are not discrepant, and no further action is required. Discrepancies involving industrial safety (8) will be resolved through updates to the Industrial Safety Manual (WHC-CM-1-10). Discrepancies involving ventilation and sanitation (3) require further evaluation by the Industrial Hygiene Programs group. Corrective actions were combined where appropriate to give a total of 3 corrective actions. All three corrective actions are to be completed by January 31, 1997.


L. M. Calderon
Manager

kb

Attachments (3)

Compliance Schedule Approval Form

September 24, 1996
WHC-TFO-XX-001



J. A. Ranschau, TWRS Safety

9-25-96
Date



L. M. Calderon, TWRS Safety Manager

9-25-96
Date



J. H. Wicks, Tank Farm Transition Projects

9/27/96
Date

1.0 REQUIREMENT

Thirteen (13) S/RID Occupational Health and Safety Requirements were identified during the Phase I S/RID Assessment as being discrepant. Each of these items is described below, along with the subsection(s) of each requirement that is not fully incorporated in company documentation.

- 1) 29 CFR 1910 Subpart D - Table of Contents, Walking/Working Surfaces (1910.21 - 1910.32).
 - 29 CFR 1910.27 contains requirements for fixed ladder location, design requirements, and safety.
- 2) 29 CFR 1910 Subpart G - Table of Contents, Occupational Health and Environmental Control (1910.94 - 1910.100).
 - 29 CFR 1910.94, Ventilation, covers various applications and methodologies to control airborne hazards. The standard specifically applies to use of abrasive blasting and wheels, grinding/polishing/buffing operations, spray finishing, and dip tank applications.
- 3) 29 CFR 1910 Subpart H - Table of Contents, Hazardous Materials (1910.101 - 1910.120).
 - 29 CFR 1910.101 contains requirements for compressed gases, including inspection of cylinder storage areas, handling, storage, and use of compressed gases, safety relief devices, and transportation of compressed gases.
 - 29 CFR 1910.107 covers operations dealing with various kinds of spray (applications finishes, paints, chemicals, powders, etc. Specifics include electrical apparatus, ventilation, material handling, fire protection, electrostatic devices, and special application techniques (undercoating, powders, peroxides, dual components, fusions, etc.).

- 4) 29 CFR 1910 Subpart I - Table of Contents, Personal Protective Equipment (1910.132 - 1910.140).
 - 29 CFR 1910.134 requires a respiratory protection program that contains the following elements: permissible practice, requirements for a minimum acceptable program, selection of respirators, air quality, use of respirators, maintenance and care of respirators, and identification of gas mask canisters.
- 5) 29 CFR 1910 Subpart J - Table of Contents, General Environmental Controls (1910.141 - 1910.150).
 - 29 CFR 1910.141 contains requirements that address sanitation, including housekeeping, provision of potable/non-potable water, toilet facilities, showers and change rooms, and food handling.
- 6) 29 CFR 1910 Subpart P - Table of Contents, Hand and Portable Powered Tools and Other Hand-Held Equipment (1910.241 - 1910.247).
 - 29 CFR 1910.242 contains general requirements for hand and power tools. It states that employees are responsible for the safe condition of tools they use, and that compressed air (>30 psi) should not be used for cleaning tools and machinery.
- 7) 29 CFR 1910 Subpart S - Table of Contents, Electrical (1910.301 - 1910.399).
 - 29 CFR 1910.334 contains requirements for use of electrical equipment. This includes portable electrical equipment, electrical power and lighting circuits, test instruments and equipment, and electrical equipment near flammable materials.
- 8) 29 CFR 1926 Subpart C - Table of Contents, General Safety and Health Provisions (1926.20 - 1926.35).
 - 29 CFR 1926.27 states that requirements in 29 CFR 1926 Subpart D shall be followed. Subpart D contains requirements on ventilation, sanitation, and other environmental controls.
 - 29 CFR 1926.33 contains requirements for employee access to exposure and medical monitoring records. It outlines access to and preservation of records, OSHA access to records, access requirements with regard to trade secrets, and employers informing employees of records.
- 9) 29 CFR 1926 Subpart D - Table of Contents, Occupational Health and Environmental Controls (1926.50 - 1926.66).
 - 29 CFR 1926.51 contains requirements that address sanitation, including housekeeping, provision of potable/non-potable water, toilet facilities, showers and change rooms, and food handling.

- 29 CFR 1926.57 covers various applications and methodologies to control airborne hazards. The standard specifically applies to abrasive blasting and wheels, grinding/polishing/buffing operations, spray finishing, and dip tank applications.
- 10) 29 CFR 1926 Subpart I - Table of Contents, Tools - Hand and Power (1926.300 - 1926.307).
- 29 CFR 1926.301 contains requirements on the safety use of hand tools. Included in the standard are wrenches (do not use if jaws are sprung), impact tools (to be kept free from mushroom heads), and wooden handled tools (to be kept free from splinters and cracks).
 - 29 CFR 1926.302 contains requirements for power operated hand tools. It includes requirements for electric power tools, pneumatic tools, hydraulic powered tools, powder actuated tools, fuel powered tools, and abrasive blast cleaning nozzles.
 - 29 CFR 1926.303 contains requirements for abrasive wheels and tools. It addresses the following areas: power, guarding/guard design, use, providing work rests, and tools to meet ANSI Codes B7.1-1970.
 - 29 CFR 1926.304 contains requirements for woodworking tools in the following areas: disconnect switches, speeds, self-feed devices, guarding, personal protective equipment, and specific guarding requirements for tools such as ripsaws, table saws, bandsaws, etc.
 - 29 CFR 1926.307 covers requirements for mechanical power transmission apparatus. It includes specific guard and protection requirements for flywheels, cranks and connecting rods, shafting, pulleys, power transmission apparatus located in basements, belts, ropes and chains, gears/sprockets/chains, collars and couplings, clutches, and woodguards.
- 11) 29 CFR 1926 Subpart L - Table of Contents, Scaffolding (1926.450 - 1926.453).
- 29 CFR 1926.451 addresses the following areas for scaffolding requirements: footings, guardrails/toeboards, loads, construction materials, planking, slippery conditions, hotwork, construction requirements, and safe work practices.
 - 29 CFR 1926.453 contains requirements for manually propelled mobile ladderstands and scaffolds. It includes requirements in the following areas: workloads, worklevels, wheels/casters, stairways, bracing, endframes, erection, and specifics on stairways and ladder scaffolds.

- 12) 29 CFR 1926 Subpart M - Table of Contents, Floor and Wall Openings (1926.500 - 1926.502).
 - 29 CFR 1926.500 contains requirements for guardrails, handrails, and covers. It includes the following areas: guarding of floor openings, wall openings, and open sided floors, platforms, and runways; standard specifications for railings, handrails, and toeboards; guarding of roofs/roof edges; roof edge material storage; and training.
- 13) 29 CFR 1926 Subpart X - Table of Contents, Stairways and Ladders (1926.1050 - 1926.1060).
 - 29 CFR 1926.1051 addresses the general requirements on the use (where/when) of a ladder stairway, and required fall protection. Nonpermanent stairs, when to use ladders and stairs, and keeping passageways clear and accessible are all addressed in this standard.
 - 29 CFR 1926.1053 contains requirements for fixed ladder location, design requirements, and safety.

2.0 NONCOMPLIANCE

Specific areas of non-compliance for each of the 13 identified discrepancies are described below:

- 1) 29 CFR 1910 Subpart D
 - 29 CFR 1910.27 - Safe use and design requirements of fixed ladders are not addressed in the Industrial Safety Manual.
- 2) 29 CFR 1910 Subpart G
 - 29 CFR 1910.94 - Ventilation requirements for abrasive blasting and wheels, grinding/polishing/buffing operations, spray finishing, and dip tank applications are not addressed.
- 3) 29 CFR 1910 Subpart H
 - 29 CFR 1910.101 - Periodic inspection of gas cylinders and storage areas are not addressed in WHC-CM-1-10, WKS 14, Storage, Using, and Handling Compressed Gases in the Industrial Safety Manual.
 - 29 CFR 1910.107 - No WHC manual could be identified that covers the spray application of combustible/flammable materials (ventilation).

- 4) 29 CFR 1910 Subpart I
 - 29 CFR 1910.134 - Identification of gas mask canisters is not addressed in the Respiratory Protection Program. Further evaluation has determined that this information is the responsibility of the manufacturer, and is therefore not applicable to TWRS. No further action is required.
- 5) 29 CFR 1910 Subpart J
 - 29 CFR 1910.141 - WHC-CM-4-40, Section 4.4 was reserved to outline the sanitation protection requirements, but it was never written or issued.
- 6) 29 CFR 1910 Subpart P
 - 29 CFR 1910.242 - Cleaning requirements for hand and power tools are not addressed in WHC-CM-1-10, Industrial Safety Manual. A warning should be included not to use compressed air > 30 psi.
- 7) 29 CFR 1910 Subpart S
 - 29 CFR 1910.334 - Use of electrical equipment near flammable/combustible material is not addressed in the Industrial Safety Manual.
- 8) 29 CFR 1926 Subpart C
 - 29 CFR 1926.27 - This standard refers readers to follow the requirements outlined in 1926 Subpart D. Therefore, when the requirements of 29 CFR 1926 Subpart D are determined to be fully incorporated, this item will also be considered fully incorporated. This deficiency will be corrected upon completion of corrective action items for 1926.51 and 1926.57. No further action required.
 - 29 CFR 1926.33 - It was originally determined that this requirement was deficient because there was no documentation allowing OSHA access to medical monitoring records. Reevaluation has determined that this item is not deficient: Requests to review medical/exposure records are dealt with on an individual basis. Documenting this requirement in a sitewide manual is not mandatory and does not affect compliance. No further action is required.
- 9) 29 CFR 1926 Subpart D
 - 29 CFR 1926.51 - Section 4.4 in the WHC-CM-4-40, Industrial Hygiene Manual was reserved to outline the sanitation protection requirements, but it was never written or issued.
 - 29 CFR 1926.57 - Ventilation requirements for abrasive blasting and wheels, grinding/polishing/buffing operations, spray finishing, and dip tank applications are not incorporated.

10) 29 CFR 1926 Subpart I

- 29 CFR 1926.301 - Safe use of hand tools (wrenches, impact tools, and wooden handled tools) is not addressed in the Industrial Safety Manual.
- 29 CFR 1926.302 - Safety requirements for fuel and hydraulic powered tools are not incorporated in the Industrial Safety Manual.
- 29 CFR 1926.303 - Guard requirements and use of workrests for abrasive wheels and tools are not addressed in the Industrial Safety Manual.
- 29 CFR 1926.304 - Requirements for woodworking tools in the following areas are not incorporated in the Industrial Safety Manual: speeds, self-feed devices, and specific guarding requirements for tools such as rip saws, table saws, bandsaws, etc.
- 29 CFR 1926.307 - Requirements on guarding of mechanical power transmission apparatus, and specific types of machinery are not incorporated in the Industrial Safety Manual.

11) 29 CFR 1926 Subpart L

- 29 CFR 1926.451 - The requirement that scaffolding work shall be prohibited during high winds or stormy conditions is not incorporated in the Industrial Safety Manual.
- 29 CFR 1926.453 - Ladderstands and stairway requirements are not incorporated in the Industrial Safety Manual.

12) 29 CFR 1926 Subpart M

- 29 CFR 1926.500 - Guards and fall protection requirements for roofs/roof work, and roof-edge storage of materials and equipment is not incorporated in the Industrial Safety Manual.

13) 29 CFR 1926 Subpart X

- 29 CFR 1926.1051 - General requirements on when ladders/stairways should be used (e.g. a break in elevation of more than 19 inches), and how many are required in specific areas is not addressed in the Industrial Safety Manual.
- 29 CFR 1926.1053 - Fixed ladder location and safety requirements are not addressed in the Industrial Safety Manual.

3.0 RISK

None of the discrepancies listed above were judged to present an increased hazard to employees. Measures are in place to ensure employee safety and health is not endangered, including job hazard analyses, Industrial Safety/Industrial Hygiene review of work packages to ensure specific hazards

are identified and controlled prior to work, safety surveillances, and training. Steps are being taken to resolve each discrepancy.

4.0 COMPENSATORY MEASURES

There is no increased risk to the health and safety of the worker, the public, or the environment because compensatory measures are in place. These include job hazard analyses, Industrial Safety/Industrial Hygiene review of work packages to ensure specific hazards are identified and controlled prior to work, safety surveillances, pre-job safety meetings, and training.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

Corrective actions for the 13 discrepant items are shown below. Corrections or updates to manual sections were combined into single actions as appropriate. The discrepancy that is resolved by the corrective action is also noted.

- 1) General safety requirements for industrial safety related discrepancies are included in the Industrial Safety Manual, but specific requirements (e.g. specific guard requirements for woodworking tools) are deemed to be inappropriate for this type of manual. In each section, the reader is referred to the appropriate section of 29 CFR 1910 or 1926 for more information on specific requirements.

To ensure clarity, a policy statement will be added to the Industrial Safety Manual (WHC-CM-1-10) specifying the mandatory nature of all applicable sections of 29 CFR 1910 and 1926. This will be completed by January 31, 1997.

This action will bring WHC documentation into compliance with

- 29 CFR 1910 Subpart D
- 29 CFR 1910 Subpart P
- 29 CFR 1910 Subpart S
- 29 CFR 1926 Subpart I
- 29 CFR 1926 Subpart L
- 29 CFR 1926 Subpart M
- 29 CFR 1926 Subpart X

- 2) Further evaluation will be completed by Industrial Hygiene Programs on the need for incorporation of ventilation requirements into the Industrial Hygiene Manual (WHC-CM-1-11 or WHC-CM-4-40).

This action applies to discrepancies identified in 29 CFR 1910 Subpart G, 1910 Subpart H (1910.107), and 1926 Subpart D, (1926.57).

- 3) Further evaluation will be completed by Industrial Hygiene Programs on the need for incorporation of sanitation requirements into the Industrial Hygiene Manual (WHC-CM-1-11 or WHC-CM-4-40).

This action applies to discrepancies identified in 29 CFR 1910 Subpart J (1910.141) and 1926 Subpart D (1926.51).

5.2 Schedule for Corrective Actions

- 1) Addition of a policy statement to WHC-CM-1-10 regarding mandatory nature of requirements contained in 29 CFR 1910 and 1926 will be completed by January 31, 1997 by Industrial Safety and Fire Protection.
- 2) Further evaluation of incorporation of ventilation requirements into the Industrial Hygiene Manual will be completed by January 31, 1997 by Industrial Hygiene Programs.
- 3) Further evaluation of incorporation of sanitation requirements into the Industrial Hygiene Manual will be completed by January 31, 1997 by Industrial Hygiene Programs.

6.0 JUSTIFICATION FOR APPROVAL

The prescribed corrective actions should bring company documentation into compliance with the discrepant areas identified in the OSH S/RID Phase I Assessment. Due to safety measures that are in place, it is unlikely that employee health and safety will be affected.

7.0 RESOURCE IMPACTS

Manual changes will be made as part of manual owner responsibilities and are not expected to impact funding.

8.0 LIST OF ATTACHMENTS

None

DOE-RL Approval _____ Date _____

Compliance Schedule Approval Form

September 23, 1996
WHC-TFO-XX-001

[Signature] 9/24/96
Originator Date

[Signature] 9/25/96
Reviewer Date

[Signature] 9/27/96
Approval Date

1.0 REQUIREMENT

Sub-element 12.1 Management and Administration

DOE 5480.7A Section 9.c(4)

This section requires that minimum requirements to establish "operability" shall be developed for fire protection features such as: fire doors, fire dampers, fire detection and suppression systems, fire protection water supplies, etc.

2.0 NONCOMPLIANCE

The operability specifications (IP-0842) related to fire protection must be identified to specifically address limitations and/or mitigating features.

3.0 RISK

There is little or no increased risk to the worker, public or environment. The current methods for establishing limitations and mitigating/compensatory measures are acceptable and can be found in other higher tier standards and orders, but are not specifically identified in the plant manual.

4.0 COMPENSATORY MEASURES

None.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

WHC-IP-0842, Section 4.4, Fire Protection, must be revised to include limitations and compensatory measures.

5.2 Schedule for Corrective Actions

The manual will be revised during the next manual revision, but no later than September 30, 1997.

6.0 JUSTIFICATION FOR APPROVAL

This is mainly a documentation issue. The proper methods are being used, but the manual requires revision. There is little or no increased risk to the worker, public or environment. The current methods for establishing limitations and mitigating/compensatory measures are acceptable and can be found in other higher tier standards and orders, but are not specifically identified in the plant manual.

7.0 RESOURCE IMPACTS

Minimal. The manual will be revised as part of the normal manual revision process.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

Compliance Schedule Approval Form

September 23, 1996
WHC-TFO-XX-001

W.F. Embury 9/24/96
Originator Date

S.M. Calderon 9/24/96
Reviewer Date

W. Calderon 9/27/96
Approval Date

1.0 REQUIREMENT

Sub-element 12.4 Fire Prevention

RLID 5480.7 Section 8.2.e - This section requires that Nuclear facilities and laboratories shall have interior finish materials (decorations, furnishings, and exposed wall or insulating materials) that have an Underwriters Laboratories (ASTM E-84/NFPA 255) flame spread rating of 25 or less, and smoke developed rating of 50 or less, except for acoustical materials, which shall have a smoke developed rating of 100 or less.

2.0 NONCOMPLIANCE

The administration manual (IP-0842) must be revised to include the specific interior finish requirements.

3.0 RISK

There is little or no increased risk to the worker, public or environment. The requirements are being met and can be found in other higher tier standards and orders, but are not properly identified in the administration manual.

4.0 COMPENSATORY MEASURES

None.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

WHC-IP-0842, Section 4.4, Fire Protection, must be expanded to identify specific limitations for interior finish.

5.2 Schedule for Corrective Actions

The manual will be revised during the next manual revision, but no later than September 30, 1997.

6.0 JUSTIFICATION FOR APPROVAL

This is mainly a documentation issue. The proper methods are being used, but the manual requires revision. There is little or no increased risk to the worker, public or environment. The requirements are being met and can be found in other higher tier standards and orders, but are not properly identified in the administration manual.

7.0 RESOURCE IMPACTS

Minimal. The manual will be revised as part of the normal manual revision process.

8.0 LIST OF ATTACHMENTS

None.

DOE-RL Approval

Date

Waste Management and Environmental Management

Attachment 8

**Westinghouse
Hanford Company**

**Internal
Memo**

From: Environmental Cleanup and Compliance Project 77550-96-013
Phone: 373-5617 R2-36
Date: September 27, 1996
Subject: STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENT DISCREPANCY
CLOSEOUT

To: C. L. Day-Phalen R2-52
cc: D. Alison R1-51
E. Biebesheimer R2-52
K. L. Englehardt R1-51
J. D. Guberski R1-51
LAG File/LB

The following actions were taken to resolve identified discrepancies in the TWRS standards/requirements identification document (S/RID) inventory performed by Environmental Compliance and Support Services:

Item 16.1.3 referencing 40 Code of Federal Regulations (CFR) 268 (940701) part 7(a) Introduction

- Changed reference from CM-7-5, section 7.8 to 7.11.2.2.1 and incorporated.

Item 16.1.3 referencing WAC-173-303 (940523), section 140(4)(a)

- Added reference to CM-7-5, section 7.6.13 and incorporated.

Item 16.1.3 referencing WAC-173-303 (940523), section 170(4)

- Placed statement in application comment section that an engineering change notice (ECN) is needed to S/RID as requirement was eliminated by chapters 70.105 and 70.105D Regulatory Code of Washington (RCW), 95-22-008 (order 94-30), pp 173-303-170, filed October 19, 1995, effective November 19, 1995.
- Submitted information for a ECN change to S/RID--see attached ECN draft text.

Item 16.1.3 referencing 40 CFR 268 part 7(b) Introduction, (1), (2), (3), (5) and (6)

- Added reference to CM-7-5, section 7.11.2.2.3 and incorporated.

Item 16.1.3 referencing WAC-173-303 (940523), section 150(1), (2) and (3)

- A controlled manual document change request was submitted for incorporating changes to section 7.11.3.5--see attached controlled manual document change request (CMDCR) sections.

C. L. Day-Phalen
Page 2
September 25, 1996

Item 16.2.3 referencing 40CFR761 part 60(a)(2)(iii)(D)(3),-(3)(iii)(E)(4), (b), (c), -(c)(2) and -(c)(7)

- Added the following statement: "The following change to section 3.6.13 has been requested, 'Disposal of PCB items on articles to be done in accordance with 40CFR761, part 60(b) and 60(c).'"
- A CMDCR was submitted for incorporating changes to section 3.6.13--see attached CMDCR sections.

Item 16.8.2 referencing WAC-173-303 (940523) section 395(4)

- Added reference for CM-7-5 section 7.10.3 and incorporated.

Item 16.8.4 referencing WAC-173-303 (940523) sections 640(2)(a),(b), (c), (d), (e), sections (3)(a), (b) and (7)(f)

- Added reference to IP-1026 section 2.2.2.
- 6 Added comment "second bullet incorporated WHC-CM-7-5 section 7.10.2.2 on permits. The permitting process addresses that the requirements are met prior to issuance of permits or permit revision."
- Deleted reference to CM-7-5 and incorporated.

Item 16.8.4 referencing WAC-173-303 (940523) section 640(10)(b)

- Added reference to CM-7-5 section 7.10
- Added comment "This requirement is not directly applicable to interim status tank systems. 40 CFR 265.198 applies and is included by reference to WAS 173-303-400 in section 7.10.2.2.3.a."

Item 20.6.3 referencing WAC-173-360 section 370(1) and (2)

- Added reference to CM-7-5 section 3.7.2.2.8.b and incorporated

Item 20.6.4 referencing 40CFR61 part 92

- Marked as not applicable with justification that subject requirement is found in section 20.4.3 and that this requirement does not pertain to records management.
- Added comment, "A request has been submitted to eliminate this requirement from this section. It is also found in section 20.4.3 and is already incorporated."
- Submitted information for an ECN change--see attached ECN draft text.
- Removed evidence reference to CM-7-5 section 2.5.3.1.a and 2.5.2

C. L. Day-Phalen
Page 3
September 25, 1996

If you have any questions, please feel free to contact myself or
J. G. Guberski of my staff.



Lisa Garner, Manager
Environmental Cleanup and Compliance Project

ljt

Attachment

Attachment B

Compliance Schedule Approval Form

Date
WHC-TFO-XX-001

J. D. Guberski J. D. Guberski 9/24/96
Originator Date

D. Alison D. Alison 9/25/96
Reviewer Date

J. Garrison 9/25/96
Approval Date

J. H. Wicks 9/27/96
Approval JH Wicks

1.0 REQUIREMENT

S/RID 16.2.3, PCB Waste Labeling

40 CFR 761 Part 60(a), (b), (c) contain requirements on appropriate disposal of items containing polychlorinated biphenals at concentrations greater than 50 ppm. It also addresses disposal requirements for container disposal. Storage of liquid polychlorinated biphenals or large polychlorinated biphenyl contaminated capacitors and electrical equipment are also addressed.

2.0 NONCOMPLIANCE

The WHC-CM-7-5, "Environmental Compliance" manual does not identify or reference these requirements. The requirements are being complied with by following a desk instruction.

The major activity involved is removal of excess or previously abandoned equipment from the tank farms.

3.0 RISK

There is no impact on the waste shipment activity or increased risk as polychlorinated biphenyl contaminated items are not being shipped for disposal, with the exception of light ballasts which are addressed in WHC-CM-7-5. The other items are being stored on site, by IFK-Kaiser, for ultimate disposal. These items are also radioactive contaminated items.

4.0 COMPENSATORY MEASURES

Continue to use existing systems.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

A Controlled Manual Document Change Request was submitted to include these requirements in WHC-CM-7-5 [copy attached]. This change was recommended for incorporation as part of the annual review and update.

Attachment B (cont.)

5.2 Schedule for Corrective Actions

The Controlled Manual Document Change Request will be considered for the March 1997 routine update. WHC-CM-7-5 is normally updated twice in a fiscal year in March and September. The September update is considered the annual update. However, the change in contractors and a policy decision to make WHC-CM-7-5 more of a guidance document rather than an implementation document could result in these changes being in the September update.

6.0 JUSTIFICATION FOR APPROVAL

The requirements are well known to personnel involved in the waste designation process and are covered in desk instructions used for waste designation. In general, polychlorinated biphenyl contaminated items are shipped to ICF-Kaiser for storage until an acceptable method of disposal can be established.

7.0 RESOURCE IMPACTS

Resources and funding are those included in TPCN

8.0 LIST OF ATTACHMENTS

Controlled Manual Document Change Request to update WHC-CM-7-5

Printed copy of CC:Mail message from W. Toebe to J. Guberski that proposed changes will be considered [item 5].

DOE-RL Approval _____

Date _____

Subelement Title: PCB Waste Labeling
Subelement Number: 16.2.3
Functional Area: WASTE MANAGEMENT

Requirement Reference: 40CFR761 Part 60(a)(2)(iii)(D)(3)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

Liquids, other than mineral oil dielectric fluid, containing a PCB concentration of 50 ppm or greater, but less than 500 ppm, shall be disposed of:

(i) In an incinerator which complies with 761.70;

(ii) In a chemical waste landfill which complies with 761.75 if information is provided to the owner or operator of the chemical waste landfill that shows that the waste does not exceed 500 ppm PCB and is not an ignitable waste as described in 761.75(b)(8)(iii);

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3. 0 **Incorporated** **Discrepant**

Description of Discrepancy:

DISPOSAL OF PCB ARTICLES NOT ADDRESSED

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	3.6
Revision:	Issued:
Title:	PCB'S

Requirement Reference: 40CFR761 Part 60(a)(2)(iii)(D)(3)(iii)(E)(4)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

Any non-liquid PCBs at concentrations of 50 ppm or greater in the form of contaminated soil, rags, or other debris shall be disposed of:

(i) In an incinerator which complies with 761.70; or

(ii) In a chemical waste landfill which complies with 761.75.

Note: Except as provided in 761.75(b)(8)(ii), liquid PCBs shall not be processed into non-liquid forms to circumvent the high temperature incineration requirements of 761.60(a).

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

DISPOSAL OF PCB ARTICLES NOT ADDRESSED

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	3.6
Revision:	Issued:
Title:	PCB'S

Requirement Reference: 40CFR761 Part 60(b)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

PCB Articles-
(1) Transformers.

(i) PCB Transformers shall be disposed of in accordance with either of the following:

(A) In an incinerator that complies with 761.70; or

(B) In a chemical waste landfill which complies with 761.75: Provided That the transformer is first drained of all free flowing liquid filled with solvent, allowed to stand for at least 18 hours and then drained thoroughly. PCB liquids that are removed shall be disposed of in accordance with paragraph (a) of this section. Solvents may include kerosene, xylene, toluene and other solvents in which PCBs are readily soluble. Precautionary measures should be taken however, that the solvent flushing procedure is conducted in accordance with applicable safety and health standards as required by Federal or State regulations.

(ii) [Reserved]

(2) PCB Capacitors.

(i) The disposal of any capacitor shall comply with all requirements of this subpart unless it is known from label or nameplate information manufacturer's literature (including documented communications with the manufacturer) or chemical analysis that the capacitor does not contain PCBs.

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

DISPOSAL OF PCB ARTICLE NOT ADDRESSED

Required Action:

Requirement Comment:

Documents for Revision

Document #: WHC-CM-7-5
Section: 3.6
Revision: **Issued:**
Title: PCB'S

Requirement Reference: 40CFR761 Part 60(c)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

PCB Containers.

(1) Unless decontaminated in compliance with §761.79 or as provided in paragraph (c)(2) of this section, a PCB container with PCB concentrations at 500 ppm or greater shall be disposed of:

(i) In an incinerator which complies with §761.70, or

(ii) In a chemical waste landfill that complies with §761.75; provided that if there are PCBs in a liquid state the PCB Container shall first be drained and the PCB liquid disposed of in accordance with paragraph (a) of this section.

(2) Any PCB Container used to contain only PCBs at a concentration less than 500 ppm shall be disposed of as municipal solid wastes; provided that if the PCBs are in a liquid state the PCB Container shall first be drained and the PCB liquid shall be disposed of in accordance with paragraph (a) of this section.

(3) Prior to disposal a PCB container with PCB concentrations at 50 ppm or greater shall be stored in a facility which complies with §761.65.

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

DISPOSAL OF PCB CONTAINERS NOT ADDRESSED

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	3.6
Revision:	Issued:
Title:	PCB'S

Requirement Reference: 40CFR761 Part 65(c)(2)
Accountable Organization: 00000
Implementing Organization(s):

Requirement Statement:

Non-leaking and structurally undamaged PCB Large High Voltage Capacitors and PCB-Contaminated Electrical Equipment that have not been drained of free flowing dielectric fluid may be stored on pallets next to a storage facility that meets the requirements of paragraph (b) of this section. PCB-Contaminated Electrical Equipment that has been drained of free flowing dielectric fluid is not subject to the storage provisions of 761.65. Storage under this subparagraph will be permitted only when the storage facility has immediately available unfilled storage space equal to 10 percent of the volume of capacitors and equipment stored outside the facility. The capacitors and equipment temporarily stored outside the facility shall be checked for leaks weekly.

Assessment Data

1. 0 Applicable: Yes

2. 0 Justification:

3.0 Incorporated Discrepant

Description of Discrepancy:

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	3.6
Revision:	Issued:
Title:	PCB'S

Requirement Reference: 40CFR761 Part 65(c)(7)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

Storage containers for liquid PCBs can be larger than the containers specified in paragraph (c)(6) of this section provided that:

(i) The containers are designed, constructed, and operated in compliance with Occupational Safety and Health Standards, 29 CFR 1910.106, Flammable and combustible liquids. Before using these containers for storing PCBs, the design of the containers must be reviewed to determine the effect on the structural safety of the containers that will result from placing liquids with the specific gravity of PCBs into the containers (see 29 CFR 1910.106(b)(1)(i)(f)).

(ii) The owners or operators of any facility using containers described in paragraph (c)(7)(i) of this section, shall prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan as described in Part 112 of this title. In complying with 40 CFR Part 112, the owner or operator shall read "oil(s)" as "PCB(s)" whenever it appears. The exemptions for storage capacity, 40 CFR 112.1(d)(2), and the amendment of SPCC plans by the Regional Administrator, 40 CFR 112.4, shall not apply unless some fraction of the liquids stored in the container are oils as defined by section 311 of the Clean Water Act.

p□

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

LARGE STORAGE CONTAINERS NOT ADEQUATELY ADDRESSED

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	3.6
Revision:	Issued:
Title:	PCB'S

Regulated Substance Management

Disposal of PCB items on articles to be done in accordance with 40 CFR 761 Part 60(a), Part 60(b), Part 60(c)

- d. Large PCB capacitors (> 500 ppm PCB) and PCB-filled electromagnets (> 500 ppm PCB) in storage for disposal: monthly, as a minimum.
 - e. PCB and PCB-contaminated items outside of an approved storage facility awaiting disposal: weekly, as a minimum.
 - f. Approved storage facility floors and curbs for signs of cracks, cuts, or significant deterioration: monthly, as a minimum.
7. Maintain records of sampling, retrofitting, inspection, and spill response for all PCB and PCB-contaminated hydraulic and heat transfer systems as required by 40 CFR 761.180.
- IF the records are for nonradioactive items, THEN forward copies to ECO responsible for project, or facility.
- IF the records are for radioactive items, THEN forward copies to WHC Solid Waste Management, quarterly.
8. PCB storage requirements are as follows per 40 CFR 761.65:
- Facility criterion for storing PCB and PCB items designated for disposal: 40 CFR 761.65(b)(1), 761.65(c)(2), 761.65(c)(7)
 - Items that can be stored in areas not complying with 40 CFR 761.65(b)(1), for up to 30 days: 40 CFR 761.65(c)(1), on condition that a notation is attached to the service.
9. Store all radioactive PCB waste at the Hanford Central Waste Complex. Do not store radioactive PCB waste for longer than 30 days outside the Hanford Central Waste Complex. Drums containing radioactive PCBs at a concentration greater than 499 ppm must be moved into CWC immediately.
10. Certain wastes containing PCBs in concentrations greater than or equal to 2 ppm may be regulated under WAC 173-303 as a dangerous or mixed waste. See Section 7.6 of this manual for information on the waste designation process. There are some wastes that will require management under both TSCA and Ecology's state RCRA program.
11. Transport PCB and PCB items per the applicable requirements per 40 CFR 761.40(b), 761.45, 761.60 and 761.65(c)(b).
12. IF an exception report is required from an offsite storage or disposal facility, THEN follow the sections described in 40 CFR 761.215 for report submittal, as required.
13. Receive and maintain Certificates of Disposal records for each shipment of PCB waste. Add text to 13
14. Washington State Dangerous Waste regulations cover intact and nonleaking PCB small capacitors and PCB light ballasts. Handle these items as a dangerous waste or as a PCB waste.

Author: Wayne E Toebe at ~WHC304
Date: 9/17/96 4:08 PM
Priority: Normal
TO: John D Guberski at ~HANFORD04E
CC: Sid Ailes at ~WHC340
CC: Eric Biebesheimer at ~HANFORD05B
CC: Kenneth L Engelhardt at ~WHC266
CC: Kirk A Peterson
CC: John A Bates
Subject: CMDCR-BCM

----- Message Contents -----

Attached is a DSI file with responses to your CMDCR from this morning.
Feel free to call and discuss with me.

To: J. D. Guberski R1-51
From: W. E. Toebe H6-22

cc: K. L. Engelhardt R1-51
S. Ailes H0-50
E. Biebesheimer R2-52

Subject: CONTROLLED MANUAL DOCUMENT CHANGE REQUEST FOR WHC-CM-7-5

Thank you for your interest in assuring that WHC-CM-7-5 (the ECM) provides an accurate source for identification of environmental requirements. I have addressed each of your comments below.

1. **REQUEST:** Incorporate requirements of WAC 173-360-370(1), including the requirement for systems testing by a licensed tank services provider. You recommend incorporation of the requirement between 3.7.2.2.7.e and f.

RESPONSE: The requirements of WAC 173-360-370 are already referenced in the ECM (see 3.7.2.2.8.b.). Also, please note that in your request, you cited an obsolete version of WAC 173-360. The current version no longer requires use of a licensed tank services provider (WAC 173-360-640 through 173-360-695 have been repealed). Instead, certified UST supervisors can be used to provide necessary services in accordance with the current WAC 173-360-370 (see also the current WAC 173-360-630).

2. **REQUEST:** Incorporate specific requirements of 40 CFR 268.7(b)(1), (2), (3) and (5). You recommend incorporation at 7.7.1.1.d and 7.11.2.1.

RESPONSE: The requirements of 40 CFR 268.7(b) are identified by reference at 7.11.2.2.3. Note: I recognize that many of the requirements of 40 CFR 268 can be difficult to understand. Conveying these continually-changing requirements in the ECM is a challenge. We intend to continue working to improve the clarity of LDR requirements in future controlled manual revisions. Clarification of these requirements will be considered in upcoming revision(s).

3. **REQUEST:** Incorporate specific requirements of 40 CFR 268.7(b)(6). You recommend incorporation at 7.8.1.1.6.

RESPONSE: Same as response for item 2 above.

4. **REQUEST:** Incorporate the requirements of WAC 173-303-150 concerning division, dilution, and accumulation.

RESPONSE: This comment merits consideration. It may be appropriate to modify 7.11.3.5 to clarify the provisions of this regulation.

5. **REQUEST:** Incorporate specific disposal requirements of 40 CFR 761.60 and specific storage requirements of 40 CFR 761.65.

RESPONSE: These comments merit consideration.

6. **REQUEST:** Incorporate requirements of WAC 173-303-640(10). You recommend incorporation at 7.10.2.2.3.b.

RESPONSE: The requirements of 7.10 are intended to be used for compliance with Ecology's interim status requirements (see 7.10.2) which, for tank systems, require consultation of 40 CFR 265, Subpart J by reference at WAC 173-303-400(3)(a). In other words, WAC 173-303-640(10) is not directly applicable to interim status tank systems. Instead, 40 CFR 265.198, which is part of 40 CFR 265, Subpart J, applies. This requirement is included by reference to WAC 173-303-400 at 7.10.2.2.3.a, which requires compliance with 40 CFR 265 Subparts F through R, which in turn includes Subpart J. Please note that in addition to Subpart J, managers of interim status tank systems must comply with WAC 173-303-395 by reference at WAC 173-303-400.

Of the six items identified, two will immediately be further examined for potential incorporation into the ECM (items 4 and 5). In addition, your comments concerning LDR requirements will be considered in future efforts to improve the useability of the ECM. Thanks for the opportunity to assist you concerning Hanford environmental requirements. If you have questions or concerns, please contact me at 372-2359.

Attachment B

Compliance Schedule Approval Form

Date
WHC-TFO-XX-001

J. D. Guberski J. D. Guberski 9/25/96
Originator Date

D. Alison D. Alison 9/25/96
Reviewer Date

He Garner 9/25/96
Approval Date

W. K. A. Jones 9/27/96
Approval JH Wicks

1.0 REQUIREMENT

S/RID 16.1.3. Mixed/Dangerous Waste

WAC-173-303(940523) Section 150(1) prohibits any action taken to evade the intent of this regulation by dividing or diluting wastes to change their designation, except for the purposes of treating, neutralizing, or detoxifying such wastes.

WAC -173-303(940523) Section 150(2) allows separation of a homogenous waste into heterogenous phases without such action being considered division provided that the person generating the waste either, (a) designates the homogenous waste before separation, and handles the entire waste accordingly; or (b) designates each phase of the heterogenous waste, in accordance with the dangerous waste designation requirements of this chapter, and handles each phase accordingly.

WAC-173-303(940523) Section 150(3) states that for the purposes of designation, quantities of continuously generated wastes shall be summed monthly. All other wastes generated less frequently than once a month shall be considered as batch or single event wastes.

2.0 NONCOMPLIANCE

The WHC-CM-7-5, "Environmental Compliance" manual does not identify or reference these requirements. Desk instructions [Environmental Waste Operations or Solid Waste Engineering] provide this information as part of the waste designation process, but do not identify the requirement except by a general reference to WAC 173-303.

The major activity involved is designation and shipment of solid waste from tank farms to the Central Waste Complex or off-site.

3.0 RISK

There is no impact on the waste shipment activity or increased risk as the personnel involved are well aware of the requirements through training and desk instructions.

4.0 COMPENSATORY MEASURES

Continue to use existing training and desk instructions which adequately incorporate the requirements.

5.0 CORRECTIVE ACTIONS

5.1 Description of Corrective Actions

A Controlled Manual Document Change Request was submitted to include these requirements in WHC-CM-7-5 [copy attached]. This change was recommended for incorporation as part of the annual review and update.

Attachment B (cont.)

5.2 Schedule for Corrective Actions

The Controlled Manual Document Change Request will be considered for the March 1997 routine update. WHC-CM-7-5 is normally updated twice in a fiscal year in March and September. The September update is considered the annual update. However, the change in contractors and a policy decision to make WHC-CM-7-5 more of a guidance document rather than an implementation document could result in these changes being in the September update.

6.0 JUSTIFICATION FOR APPROVAL

The requirements are well known to personnel involved in the waste designation process and are covered in desk instructions used for waste designation. In general, waste is designated based on the source without making use of the provisions allowing separation by phases or dilution incidental to treatment, neutralization or detoxification. At this time wastes are generated on a batch basis with no scheduled [next few calendar years] term continuous waste generation process.

7.0 RESOURCE IMPACTS

Resources and funding are those included in TPCN

8.0 LIST OF ATTACHMENTS

Controlled Manual Document Change Request to update WHC-CM-7-5

Printed copy of CC:Mail message from W. Toebe to J. Guberski that proposed changes will be considered [item 4].

DOE-RL Approval _____ Date _____

Requirement Reference: WAC-173-303(940523) Section 150(1)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

Any action taken to evade the intent of this regulation by dividing or diluting wastes to change their designation shall be prohibited, except for the purposes of treating, neutralizing, or detoxifying such wastes.

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

WASTE DESIGNATION PROCESS DOES NOT CAUTION AGAINST DILUTION PROHIBITION

Required Action:

Requirement Comment:

Documents for Revision

Document #:		WHC-CM-7-5
Section:	7.6	
Revision:		Issued:
Title:		

Requirement Reference: WAC-173-303(940523) Section 150(2)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

Separation of a homogeneous waste into heterogeneous phases (e.g., separation of a suspension into sludge and liquid phases, or of a solvent/water mixture into solvent and water phases, etc.) shall not be considered as division, provided that the person generating the waste either:

- (a) Designates the homogeneous waste before separation, and handles the entire waste accordingly; or
- (b) Designates each phase of the heterogeneous waste, in accordance with the dangerous waste designation requirements of this chapter, and handles each phase accordingly.

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

WASTE DESIGNATION DOES NOT IDENTIFY OPTIONS FOR DESIGNATION OF HOMOGENOUS WASTES THAT CAN BE SEPERATED INTO HETEROGENOUS PORTIONS

Required Action:

Requirement Comment:

Documents for Revision

Document #: WHC-CM-7-5
Section: 7.6
Revision: **Issued:**
Title:

Requirement Reference: WAC-173-303(940523) Section 150(3)

Accountable Organization: 00000

Implementing Organization(s):

Requirement Statement:

For the purposes of designation, quantities of continuously generated wastes shall be summed monthly. All wastes generated less frequently than once a month shall be considered as batch or single event wastes.

Assessment Data

1. 0 **Applicable:** Yes

2. 0 **Justification:**

3.0 **Incorporated** **Discrepant**

Description of Discrepancy:

direction on summation of continuously generated wastes not identified

Required Action:

Requirement Comment:

Documents for Revision

Document #:	WHC-CM-7-5
Section:	7.6
Revision:	Issued:
Title:	

Managing Solid Waste

responsibilities for proper identification and management of wastes that are subject to the Dangerous Waste Regulations, WAC 173-303.

7.6.1 Responsibilities

Guidance on allowable actions to separate, divide or dilute waste and designate of quantities for environmentally granted waste is available to comply with WAC 173-303 section 150.

1. Generators. Waste generators shall
 - a. Designate waste in accordance with applicable federal and state requirements. In order to complete a waste designation, the generator may complete the waste designation with their own resources, may ask for assistance from other organizations such as Solid Waste Disposal or Environmental Services, or may ask Generator and Waste acceptance Services to perform the designation for them. ↑
 - b. Offer completed waste designations to receiving TSD unit and/or offsite disposal facility personnel when requested. For direct offsite shipments of nonradioactive dangerous waste (milk runs) and movements of dangerous or mixed waste into Solid Waste Disposal TSD units (i.e., 616, CWC, LLBG, TRUSAF, T Plant, and WRAP), supply waste designations to Solid Waste Disposal prior to shipment or movement for verification. For nondangerous containerized waste, see Subsection 7.3.4.3.
 - c. Develop sampling and analysis plans and/or waste analysis plans, as appropriate.
2. Environmental Policy or RCRA Field Services shall
 - a. Provide guidance and review information on waste designation issues when requested, and
 - b. Maintain the waste designation training course described in Section 11.0.
3. Sample Data and Laboratory Administration shall
 - a. Provide requested guidance, including validation and verification, concerning the sampling and analysis of waste.
 - b. Co-review, with Solid Waste Disposal, sample and analysis plans, when requested.
4. Solid Waste Disposal shall
 - a. Offer waste designation services to generators in order to answer waste designation related questions and complete waste designations. Waste designations will be completed by Solid Waste Disposal when requested by the generator.
 - b. Verify completed waste designations for waste shipment on direct offsite shipments and movements into Solid Waste Disposal TSD units.

Author: Wayne E Toebe at ~WHC304
Date: 9/17/96 4:08 PM
Priority: Normal
TO: John D Guberski at ~HANFORD04E
CC: Sid Ailes at ~WHC340
CC: Eric Biebesheimer at ~HANFORD05B
CC: Kenneth L Engelhardt at ~WHC266
CC: Kirk A Peterson
CC: John A Bates
Subject: CMDCR-ECM

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From: W. E. Toebe H6-22

cc: K. L. Engelhardt R1-51
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E. Biebesheimer R2-52

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RESPONSE: The requirements of WAC 173-360-370 are already referenced in the ECM (see 3.7.2.2.8.b.). Also, please note that in your request, you cited an obsolete version of WAC 173-360. The current version no longer requires use of a licensed tank services provider (WAC 173-360-640 through 173-360-695 have been repealed). Instead, certified UST supervisors can be used to provide necessary services in accordance with the current WAC 173-360-370 (see also the current WAC 173-360-630).

2. **REQUEST:** Incorporate specific requirements of 40 CFR 268.7(b)(1), (2), (3) and (5). You recommend incorporation at 7.7.1.1.d and 7.11.2.1.

RESPONSE: The requirements of 40 CFR 268.7(b) are identified by reference at 7.11.2.2.3. Note: I recognize that many of the requirements of 40 CFR 268 can be difficult to understand. Conveying these continually-changing requirements in the ECM is a challenge. We intend to continue working to improve the clarity of LDR requirements in future controlled manual revisions. Clarification of these requirements will be considered in upcoming revision(s).

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