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Rev. 2

Remedial Action and Waste Disposal Conduct of Operations Matrix

Prepared for the U.S. Department of Energy, Richland Operations Office
Office of Environmental Restoration

Submitted by: Bechtel Hanford, Inc.

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Remedial Action and Waste Disposal Conduct of Operations Matrix

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ACRONYMS

BHI	Bechtel Hanford, Inc.
CONOPS	Conduct of Operations
DOE	U.S. Department of Energy
ERC	Environmental Restoration Contractor
ERDF	Environmental Restoration Disposal Facility
ES&HP	environmental health and safety plan
FWENC	Foster Wheeler Environmental Corporation
HAMTC	Hanford Atomic Metals Trade Council
HASP	health and safety plan
IPM	individual performance management
OJT	on-the-job training
OSHA	Occupational Safety and Health Administration
PMII	Project Managers Implementing Instructions
PWSC	P.W. Stephens, Inc.
RAWD	remedial action and waste disposal
RCIE	RCI Environmental, Inc.
STR	Subcontract Technical Representative
WISHA	*Washington State Industrial Safety and Health Act*
WMFS	Waste Management Federal Services

1.0 INTRODUCTION

This Conduct of Operations (CONOPS) matrix incorporates the Environmental Restoration Disposal Facility (ERDF) CONOPS matrix (BHI 1996c). The ERDF CONOPS matrix has been expanded to cover all aspects of the RAWD project. All remedial action and waste disposal (RAWD) operations, including waste remediation, transportation, and disposal at the ERDF, consist of construction-type activities as opposed to nuclear power plant-like operations. In keeping with this distinction, the graded approach has been applied to the development of this matrix. This approach has been applied to individual elements of the matrix as well as to entire chapters of DOE Order 5480.19, *Conduct of Operations Requirements for DOE Facilities*, Attachment 1. Individual element applicability has been designated "Y" for complete, "P" for partial (graded), or "N" for not applicable. In some cases, entire chapters of U.S. Department of Energy (DOE) Order 5480.19 are not applicable to any RAWD operations. These are noted below:

- Chapter III, "Control Area Activities." There are no control rooms at RAWD operations.

- Chapter X, "Independent Verification." There are no safety-related systems on the ERDF Project or on any other portion of the RAWD Project.

- Chapter XIII, "Operations Aspects of Facility Chemistry and Unique Processes." The RAWD does not have chemical production facilities or unique processes. It relies upon conventional soil remediation, transportation, and waste disposal techniques to accomplish its mission.

- Chapter XVII, "Operator Aid Postings." RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.

While some CONOPS elements apply to all RAWD sites, some are only applied at specific sites. Where specific sites or organizations are designated in the "RAWD SITE" column of the matrix, those not mentioned are excluded from that element. For example, "All" means the element applies to all RAWD sites, "ERC" means the element applies to all Environmental Restoration Contractor (ERC) personnel, and "WMFS" means that the element applies exclusively to ERDF subcontractor operations. Subcontractors' procedures and provisions of their subcontracts cited in implementing documents apply to the individual subcontractors. Bechtel Hanford, Inc. (BHI) or ERC documents do not apply to the subcontractors unless specifically noted. The subcontractors and their areas of responsibility are listed below:

- FWENC 100-NR-1 TSD Sites Remediation
- RCIE-T Waste Transportation
- RCIE-R 100-B/C Remediation
- PWSC 100H/F/K Remediation
- WMFS ERDF Waste Disposal

2.0 RAWD CONDUCT OF OPERATIONS MATRIX

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter I "Operations Organization and Administration"				
1.C.1, "Operations Policies"	All	P	BHI has overall responsibility for remediation, transportation, and waste disposal. The goals and objectives for these activities are defined in the PMII and in the performance specifications of the subcontractors. The specific means by which the subcontractors achieve these goals and objectives are detailed in the plans and procedures called for in the subcontracts. Physical security will be in compliance with the applicable chapters of DOE 470.1. The simplicity of remediation, disposal, and transportation operations do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	BHI-MA-02, Procedure 7.3, "Reporting Security Incidents" 0600X-SP-G0005, *Performance Specification for Waste Disposal Services for the ERDF* 00600X-SP-G0006, *Performance Specification for Waste Transportation Services for the ERDF* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.1 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 100X-SC-G0027, *PWSC Scope of Work* 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC)
1.C.2, "Resources"	ERC	P	The RAWD subcontracts are fixed-price contracts. Resources required to pay for the subcontracts and the ERC personnel required to administer them are planned according to the implementing document. The simplicity of RAWD operations do not require technical personnel not normally available within the commercial waste remediation and disposal industry, nor does it require a long-range staffing plan. The graded approach to the guideline is specified in the implementing document.	ER-PC-01, *Baseline and Funds Management System*

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
1.C.3, "Monitoring of Operating Performance"	ALL	P	BHI will monitor RAWD subcontractors' performance for conformance with all of the provisions of their respective contracts. Goals for the subcontractors are incorporated into their subcontracts. RAWD operations do not have safety systems or lighted annunciators (except for the ERDF, which has a small number of them in the leachate collection system). RAWD subcontracts are fixed-price contracts with payment dependent on the amount of waste remediated, transported, or disposed. The nature of the subcontracts provides the subcontractors with sufficient incentives to minimize shutdowns. Overtime will be utilized by subcontractors in a manner consistent with safe operations, commercial practice, and applicable labor agreements.	BHI-MA-01, *ERC Policies, Organization, and Responsibilities* BHI-MA-02, Procedure 2.7, "Self-Assessment" BHI-CQP-01, *Compliance & Quality Programs*, Section 1.2, "Independent Assessments and Audits" BHI-MA-02, Procedure 2.1, "Corrective Action Request" BHI-FS-01, Vol. 1, Procedure 6.1, "Subcontract Technical Representative (STR) and Work Order/Point of Contact for Field Work" BHI-FS-01, Vol. 1, Procedure 5.7, "Field Contractor and Subcontractor Quality Control" 0600X-SC-G0007, *Waste Transportation Services for the ERDF* 0600X-SC-G0006, *Waste Disposal Operations for the ERDF* 0100N-SC-G0058, 100-NR-TSD Sites Remedial Action Project 0100B-SC-G0010, 100B/C Pipelines Remedial Action Project 100X-SC-G0027, *PWSC Scope of Work*

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
1.C.4, "Accountability"	ALL	P	All ERC employees and the employees of the subcontractors are held accountable for conduct of activities in compliance with procedures. BHI implementation documents cited describe employee accountability for ERC employees. The subcontractors' employees will be held accountable according to their respective company policies. The graded approach to the guideline is specified in the implementing documents.	BHI-HR-01, Procedure 4.16, "Standards of Conduct" *ERC Employee Safety and Health Practices Booklet* (BHI 1996b) ERC Work Rules 0000X-PMII-G0004, Rev. 0, RAWD PMII RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R), Section 1.2 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) PWSC Corporate Policies and Health and Safety Program
1.C.5, "Management Training"	ERC	P	BHI first-line management will receive applicable training (i.e., Hanford Site orientation, OSHA/WISHA, and RAWD site-specific training, etc.) as well as management training as specified in the implementing document. The subcontractor is responsible for its personnel qualifications. The risks associated with typical RAWD activities do not merit the structured formality and audibility required by this guideline. Accordingly, a graded approach to this guideline will be utilized.	BHI-MA-01, *ERC Policies, Organization, and Responsibilities* BHI-MA-02, *ERC Project Procedures*

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
1.C.6, "Planning for Safety"	ALL	Y		RFS-ERDF-002.5, *WMFS Waste Materials Management Plan* RFS-ERDF-002.3, *WMFS Waste Acceptance Plan* RFS-ERDF-002.3, *WMFS Health and Safety Plan* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-001 (RCIE-R) Safety & Health Program 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.1.3 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) BHI-00736, Rev. 0, ERDF Health and Safety Plan, Section 5.14.1 (BHI 1996a)
Chapter II "Shift Routines and Operating Practices"				
2.C.1, "Status Practices"	ALL	P	The simplicity of RAWD operations, as described in Section 1.0, "Introduction," do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2 RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC)

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
2.C.2, "Safety Practices"	ALL	Y		RFS-ERDF-002.3, *WMFS Health and Safety Plan* *RCIE Transportation Operations Manual* BHI-00736, Rev. 0, ERDF Health and Safety Plan, Sections 9.0, 11.1, and 11.2 (BHI 1996a) 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
2.C.3, "Operator Inspection Tours"	ALL	P	RAWD project activities are construction-type activities. Equipment operated is predominantly subcontractor-owned rolling stock and will be inspected in accordance with the subcontractor's internal requirements. Government-owned equipment that is operated by subcontractors will be inspected in accordance with BHI-approved maintenance plans. The simplicity of RAWD field operations does not require the rigor contained in the guideline. The graded approach to inspection frequency and content is specified in the implementing document(s).	RFS-ERDF-002.7, *WMFS Equipment Maintenance Plan* BHI-00736, Rev. 0, ERDF Health and Safety Plan (BHI 1996a) *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R), Section 4 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100X-SC-G0027-2-001, *PWSC Site Specific Health and Safety Plan*
2.C.4, "Round/Tour Inspection Sheet"	ALL	P	Inspection sheet for subcontractor-owned equipment will be kept according to the subcontractor's internal requirements. Subcontractor-operated, government-owned-equipment inspection sheets will be kept according to BHI-approved maintenance plans. The simplicity of RAWD operations does not require the rigor contained in the guideline. The graded approach to record keeping during routine inspections is specified in the implementing documents.	RFS-ERDF-002.7, *WMFS Equipment Maintenance Plan* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R), Section 4 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC)

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
2.C.5, "Personnel Protection"	ALL	Y		BHI-SH-02, Procedure 1.5, "Personal Protective Equipment" RFS-ERDF-002.3, *WMFS Health and Safety Plan* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2 BHI-00736, Rev. 0, ERDF Health and Safety Plan, Sections 16.0, 16.5, 16.6, and 18.0 (BHI 1996b) 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100X-SC-G0027-2-001, *PWSC Site Specific Health and Safety Plan*
2.C.6, "Response to Indications"	WMFS	P	The only instrumented aspect of RAWD field operations is the ERDF leachate collection and storage system.	RFS-ERDF-004, *WMFS Training Plan* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2
2.C.7, "Resetting Protective Devices"	ALL	P	The graded approach to this guideline is described in the RAWD PMII and specified in the implementing documents.	RFS-ERDF-005, *WMFS Administrative Procedure* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2
2.C.8, "Load Changes"		N	The RAWD does not operate process equipment, as described in this section of the order. Load changes are not applicable to this project.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
2.C.9, "Authority to Operate Equipment"	WMFS	Y	ERDF operations personnel only change valve lineups or settings in the leachate collection system at management direction. Other RAWD operations utilize a graded approach, assigning authority to operate equipment based on training, experience, and job classification.	RFS-ERDF-005, Rev. 6, *Administrative Procedure*, Section 11.2.1 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2
2.C. 10, "Shift Operating Bases"	ALL	P	RAWD field activities are essentially construction activities, as opposed to chemical processing or power production plants, and will not have operators or operating bases, as would chemical processing or power production plants. The office trailers will function as an operating base for the facility. However, they will not necessarily be staffed at all times nor will shift turnovers (should there be any) necessarily take place at the office trailer. The graded approach to this guideline is described in the RAWD PMII.	RFS-ERDF-005, *WMFS Administrative Procedure* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2
2.C.11, "Potentially Destructive Written Material and Devices"	ALL	P	The simplicity of RAWD field activities do not require the rigor contained in the guideline. The graded approach to the guideline is described in the PMII.	BHI-MA-01, *ERC Policies, Organization, and Responsibilities* RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.2
Chapter III "Control Area Activities"				
3.C.1, "Control Area Access"		N	The RAWD does not utilize staffed control rooms.	
3.C.2, "Professional Behavior"		N	The RAWD does not utilize staffed control rooms.	
3.C.3, "Monitoring the Main Control Panels"		N	The RAWD does not utilize staffed control rooms.	
3.C.4, "Control Operator Ancillary Duties"		N	The RAWD does not utilize staffed control rooms.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
3.C.5, "Operation of Control Area Equipment"		N	The RAWD does not utilize staffed control rooms.	
Chapter IV "Communications"				
4.C.1, "Emergency Communication Systems"	ALL	P	The nature of RAWD operations are such that separate emergency communications are not warranted. The RAWD PMII describes the graded approach to this guideline.	BHI-SH-03, Vol. 1, *Emergency Management Program* RFS-ERDF-002.3, *WMFS Health and Safety Plan*, Chapter 12, "Emergency Action Plan" *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.4 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100X-SC-G0027-2-001, *PWSC Site Specific Health and Safety Plan*
4.C.2, "Public Address System"		N	The RAWD does not utilize public address systems.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
4.C.3, "Contacting Operators"	ALL	P	The RAWD does not utilize staffed control rooms. Methods will be implemented to ensure that operating bases can quickly contact field personnel or supervisors.	BHI-SH-03, Vol. 1, *Emergency Management Program* RFS-ERDF-002.3, *WMFS Health and Safety Plan*, Chapter 12 *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100X-SC-G0027-2-001, *PWSC Site Specific Health and Safety Plan*
4.C.4, "Radios"		N	The RAWD does not routinely have equipment that could inadvertently trip or actuate through the use of radios in close proximity to the equipment.	
4.C.5, "Abbreviations and Acronyms"		N	Consistent acronyms and abbreviations are not critical to continued RAWD operations.	
4.C.6, "Oral Instructions and Information Communications"		N	No complex sets of oral instructions requiring verbatim repeat back are necessary due to the simplicity of operations within the RAWD. Effective oral communications will follow good industry and business practices.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter V "Control of On-Shift Training"				
5.C.1, "Adherence to Training Program"	RCIE-T ERC	Y	HAMTC drivers are oriented to the safety and the unique operating aspects of RCIE trucks with Benlee trailers utilizing OJT. The training is administered according to BHI-FS-01, Vol. 1, Procedure 7.1.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 5.2, "ERC Training"
	WMFS	P	WMFS uses on-shift training to orient new drivers to site equipment and procedures. The rigor described for nuclear power operations is not appropriate for waste disposal operations.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures" RCIE-ERDFTRAN-0009, "Training Manual" RFS-ERDF-004, Rev. 2, "Training Plan" Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R), Section 4
5.C.2, "On-Shift Instructor Qualifications"	RCIE-T ERC	P	HAMTC drivers who have demonstrated the necessary skills, technical knowledge, and ability to train other HAMTC drivers to safely operate RCIE trucks administer OJT. There are no operating parameters to be recorded on round sheets.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training"
	WMFS	N	The rigor described for nuclear power operations is not appropriate for waste disposal operations.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
5.C.3, "Qualified Operator Supervision and Control of Trainees"	RCIE-T ERC	P	OJT trainers remain in close proximity to both trainees and truck controls during training and are always able to intervene, if necessary, to take control of load/unload aspects of the RCIE trucks. Official round sheets are not required.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training"
	WMFS	N	The rigor described for nuclear power operations is not appropriate for waste disposal operations.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"
5.C.4, "Operator Qualification Program Approval"	RCIE-T ERC	P	The HAMTC driver OJT program is approved by the transportation STR and is structured according to BHI-FS-01, Vol. 1, Procedure 7.1. RAWD does not have an operator certification program.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training"
	WMFS	N	The rigor described for nuclear power operations is not appropriate for waste disposal operations.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"
5.C.5, "Training Documentation"	RCIE-T ERC	Y	The HAMTC driver OJT is documented according to the provisions in BHI-FS-01, Vol. 1, Procedure 7.1.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training"
	WMFS	N	The rigor described for nuclear power operations is not appropriate for waste disposal operations.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
5.C.6, "Suspension of Training"	RCIE-T ERC WMFS	Y N	HAMTC driver OJT is immediately suspended in the event of accident or other abnormal condition, as stated in BHI-FS-01, Vol. 1, Procedure 7.1 The rigor described for nuclear power operations is not appropriate for waste disposal operations.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"
5.C.7, "Maximum Number of Trainees"	RCIE-T ERC WMFS	Y N	The OJT module specifies the number of trainees allowed to simultaneously participate in training of HAMTC drivers being trained to safely operate RCIE trucks with Benlee trailers. The rigor described for nuclear power operations is not appropriate for waste disposal operations.	BHI-FS-01, Vol. 1, Procedure 7.1 BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section. 4.5 BHI-HR-02, "ERC Training Procedures"

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter VI "Investigation of Abnormal Events"				
6.C.1, "Events Requiring Investigation"	ALL	P	The following portions of guideline 6.C.1: b), c), d), f), h), k), or m). do not apply to the RAWD.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6 BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" *WMFS Administrative Procedure*, RFS-ERDF-005 *RCIE Transportation Operations Manual* Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R)
6.C.2, "Investigation Responsibility"	ERC	Y	BHI is responsible for investigations of RAWD field activities.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6 BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" RFS-ERDF-005, *WMFS Administrative Manual* *RCIE Transportation Operations Manual*
6.C.3, "Investigator Qualification"	ERC	Y		BHI-MA-02, Procedure 2.4, "Root Cause Analysis" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
6.C.4, "Information to be Gathered"	ERC	Y		BHI-MA-02, Procedure 2.4, "Root Cause Analysis" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6
6.C.5, "Event Investigation"	ERC	Y		BHI-MA-02, Procedure 2.4, "Root Cause Analysis" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6
6.C.6, "Investigative Report"	ERC	Y		BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6
6.C.7, "Event Training"	All	Y		0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6 RFS-ERDF-005, *WMFS Administrative Manual* *RCIE Transportation Operations Manual* 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC)
6.C.8, "Event Trending"	ERC	Y		DOE Order 5484.1, "Environmental Protection, Safety and Health Protection Information Reporting Requirements" BHI-MA-02, Procedure 2.3, "Trend Analysis" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
6.C.9, "Sabotage"	ALL	Y		BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.6
Chapter VII "Notifications"				
7.C.1, "Notification Procedures"	ALL	Y	All personnel, BHI and subcontractor, must notify their supervisor if an emergency or nonroutine event occurs. BHI must make subsequent notifications to DOE personnel.	BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.7 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100X-SC-G0027-2-001, *PWSC Site Specific Health and Safety Plan*
7.C.2, "Notification Responsibility"	ERC	Y	All personnel, BHI and subcontractor, must notify their supervisor if an emergency or nonroutine event occurs. BHI must make subsequent notifications to DOE personnel.	BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.7
7.C.3, "Name and Phone Numbers"	ERC	Y	All personnel, BHI and subcontractor, must notify their supervisor if an emergency or nonroutine event occurs. BHI must make subsequent notifications to DOE personnel.	BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.7

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
7.C.4, "Documentation"	ERC	Y	All personnel, BHI and subcontractor, must notify their supervisor if an emergency or nonroutine event occurs. BHI must make subsequent notifications to DOE personnel.	BHI-MA-02, Procedure 2.6, "Occurrence Investigation and Reporting" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.7
7.C.5, "Communication Equipment"	ERC	Y		0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.7
Chapter VIII "Control of Equipment and System Status"				
8.C.1, "Status Change Authorization"	ALL	P	The simplicity of RAWD operations do not require the rigor contained in the guideline. There are no control area operators, and there are no equipment-based safety systems within RAWD operations. The graded approach to the guideline is described in the RAWD PMII.	RFS-ERDF-005, *WMFS Administrative Procedure* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.8 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) PWSC Health and Safety Plan
8.C.2, "Equipment and System Alignments"	WMFS	P	The leachate and washwater systems at the ERDF are the only RAWD systems relevant for this guideline. Alignments of these system valves are simple, will not change often, and will be set in the leachate management procedures, the implementing document for this guideline.	RFS-ERDF-002.6, *WMFS Leachate & Washwater Management Plan*
8.C.3, "Equipment Locking and Tagging"		N	RAWD field operations do not have any components that require special administrative controls and are routinely locked and tagged. Lock and tag for servicing is addressed in Chapter IX.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
8.C.4, "Operational Limits Compliance"		N	RAWD field operations do not operate equipment of a critical nature that requires documentation of operating limits compliance. RAWD equipment largely consists of earthmoving equipment. The ERDF leachate collection, storage, and transfer system is simple in nature and does not warrant documentation of operating limits.	
8.C.5, "Equipment Deficiency Identification and Documentation"	ALL	P	The graded approach to the guideline is described in the RAWD PMII.	RFS-ERDF-002.7, *WMFS Equipment Maintenance Plan* BHI-MA-02, Project Procedures, Procedure 2.8, "Nonconformance Control" BHI-FS-01, Vol. 1, Procedure 5.3, "Nonconforming Items and Processes" BHI-FS-01, Vol. 1, Procedure 5.7, "Field Contractor and Subcontractor Quality Control" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.8 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R)
8.C.6, "Work Authorization and Documentation"		N	There are no equipment-based safety systems located in RAWD field operations. The simplicity of the equipment and operations within the RAWD does not require the rigor of formalized procedures called for in the guideline.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
8.C.7, "Equipment Post-Maintenance Testing and Return to Service"	ALL	P	The simplicity of the equipment and operations within the RAWD does not require formalized equipment post-maintenance testing programs as called for in the guideline. Subcontractors shall perform maintenance and post-maintenance testing in accordance with their approved maintenance procedures.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.8 RFS-ERDF-002.7, *WMFS Equipment Maintenance Plan*
8.C.8, "Alarm Status"	WMFS	P	The only alarms and control panels within the RAWD are associated with the ERDF leachate collection and storage system. The simplicity of systems at ERDF does not require the rigor contained in the guideline. The graded approach to this guideline is specified in the implementing document.	RFS-ERDF-002.6, *WMFS Leachate & Washwater Management Plan* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.8
8.C.9, "Temporary Modification Control"		N	Temporary modification control as described in this element is not applicable to the RAWD.	
8.C.10, "Distribution and Control of Equipment and System Documents"	ERC WMFS	P	The simplicity of ERDF systems and operations, the absence of equipment-based safety systems, and the small workforce will be reflected in a simple change control procedure for the operating facility described in the *WMFS Administrative Procedure*. Change control for government-owned portions of the facility are described in BHI design engineering procedures cited as an implementing document.	RFS-ERDF-005, *WMFS Administrative Procedure* BHI-DE-01, EDPI-4.47-01, "Design Change Notice"

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter IX "Lockout and Tagout"				
9.C.1, "Lockout/Tagout Use"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.2, "Lockout Tagout Implementation"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program*.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.3, "Protective Materials and Hardware"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure*, *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts" 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.4, "Lockout/Tagout Program"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.5, "Procedure for Lockout/Tagout"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program*.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.6, "Application of Lockout/Tagout"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.7, "Testing or Positioning of Equipment or Components"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.8, "Periodic Inspections"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.9, "Caution Tags"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.10, "Training and Communication"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.12, "Notification of Personnel"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.13, "Outside Contractors"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.14, "Group Lockouts or Tagouts"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
9.C.15, "Shift or Personnel Changes"	ALL	Y	BHI and all of the RAWD subcontractors have adopted DOE-RL-INST-L&T.001, *Hanford Site Lockout/Tagout Program.*	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.9 BHI-FS-01, Vol. 1, Procedure 1.13, "Control of Hazardous Energy and Materials (Lockout/Tagout)" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0100B-SC-G0010-2-003, *Site Specific HASP* (RCIE-R) Exhibit G, "Subcontractor Safety & Health Requirements" for ERC Construction Subcontracts 0100N-SC-G0058-2-002-01, *Site Specific HASP* (FWENC) *PWSC Site Specific Health and Safety Plan*, 0100X-SC-G0027-2-001, Section 13.4
Chapter X "Independent Verification"				
10.C.1, "Components Requiring Independent Verification"		N	There are no equipment-based safety systems in RAWD field operations. Therefore, no independent verification is required.	
10.C.2, "Occasions Requiring Independent Verifications"		N	There are no equipment-based safety systems in RAWD field operations. Therefore, no independent verification is required.	
10.C.3, "Verification Techniques"		N	There are no equipment-based safety systems in RAWD field operations. Therefore, no independent verification is required.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter XI "Logkeeping"				
11.C.1, "Establishment of Operating Logs"	ERC	P	Narrative logs are not required for RAWD operations. There are no key shift positions or control areas established at RAWD sites. However, each STR is required to complete and maintain daily reports recording all elements of subcontractor progress and key events impacting the work. Analytical Services and other organizations performing technical services for the RAWD whose procedures require the use of narrative logs shall abide by their procedures in the use of narrative logs.	BHI-FS-01, Vol. 1, Procedure 1.3, "Logkeeping Instructions" BHI-FS-01, Vol. 1, Procedure 6.1, "Subcontractor Technical Representative (STR) and Work Order Point of Contact for Field Work" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11
11.C.2, "Timeliness of Recordings"	ERC	P	Narrative logs are not kept for RAWD activities. STRs must keep the daily reports updated and should fill out daily reports on the date of the report.	BHI-FS-01, Vol. 1, Procedure 1.3, "Logkeeping Instructions" BHI-FS-01, Vol. 1, Procedure 6.1, "Subcontractor Technical Representative (STR) and Work Order Point of Contact for Field Work" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11
11.C.3, "Information to be Recorded"	ERC	P	Daily reports will contain the following information: • Documentation of subcontractor and plant forces performance • Results of investigations of abnormal or unusual occurrences • Attachment of documentation regarding investigations performed by the subcontractor • Directions/instructions to subcontractors.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11
11.C.4, "Legibility"	ERC	P	Although narrative logs are not kept, their standards for legibility will apply to STR daily reports.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11 BHI-FS-01, Vol. 1, Procedure 1.3, "Logkeeping Instructions"

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
11.C.5, "Corrections"	ERC	P	Although narrative logs are not kept, their standards for corrections will apply to STR daily reports.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11 BHI-FS-01, Vol. 1, Procedure 1.3, "Logkeeping Instructions"
11.C.6, "Log Review"	ERC	P	Although narrative logs are not kept, their standards for review will apply to STR daily reports.	BHI-FS-01, Vol. 1, Procedure 1.3, "Logkeeping Instructions"
11.C.7, "Care and Keeping of Logs"	ERC	P	Completed RAWD subcontractor daily reports will be submitted to Document and Information Services for retention.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.11
Chapter XII "Operations Turnover"				
12.C.1, "Turnover Checklists"		N	Waste transportation is the only multiple shift operation within the RAWD. Due to the simple nature of operations and equipment at the ERDF, there are no formal turnover documents, logs, or checklists.	
12.C.2, "Document Review"		N	As stated above there will be no formal turnover documents, logs, or checklists. Therefore, this guideline does not apply.	
12.C.3, "Control Panel Walkdown"		N	There are no control panels in RAWD field operations.	
12.C.4, "Discussion and Exchange of Responsibility"	ERC RCI-T	P	There is no formal shift log. Shift turnover is accomplished by face-to-face discussions between supervisors and by reading supervisors daily reports.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.12
12.C.5, "Shift Crew Briefing"	ALL	Y		0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.12
12.C.6, "Reliefs Occurring During Shift"	ALL	P	There are no control panels to walkdown and narrative logs are not kept. The PMII describes the graded approach to this guideline.	0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.12
Chapter XIII "Operations Aspects of Facility Chemistry and Unique Processes"				
13.C.1, "Operator Responsibilities"		N	The RAWD does not have production facilities where operator action is essential to restore chemistry and process parameter control is essential for protection of the integrity of safety-related components. This guideline is not applicable to the RAWD.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
13.C.2, "Operator Knowledge"		N	The RAWD does not have production facilities where operator action is essential to restore chemistry and process parameter control is essential for protection of the integrity of safety-related components. This guideline is not applicable to the RAWD.	
13.C.3, "Operator Response to Process Problems"		N	The RAWD does not have production facilities where operator action is essential to restore chemistry and process parameter control is essential for protection of the integrity of safety-related components. This guideline is not applicable to the RAWD.	
13.C.4, "Communication Between Operations and Process Personnel"		N	The RAWD does not have production facilities where operator action is essential to restore chemistry and process parameter control is essential for protection of the integrity of safety-related components. This guideline is not applicable to the RAWD.	
Chapter XIV "Required Reading"				
14.C.1, "File Index"	ERC WMFS	P	This guideline will apply to BHI personnel and to subcontractor personnel when required by the subcontractor's procedures.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 2.5, "Lessons Learned" BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.14 RFS-ERDF-005, *WMFS Administrative Procedure*

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
14.C.2, "Reading Assignments"	ERC WMFS	P	This guideline follows a graded approach and will apply to BHI personnel and to some WMFS management personnel.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 2.5, "Lessons Learned" BHI-MA-02, Procedure 5.2, "ERC Training" RFS-ERDF-005, *WMFS Administrative Procedure* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.14
14.C.3, "Required Dates for Completion of Reading"	ERC WMFS	P	This guideline follows a graded approach and will apply to BHI personnel and to some WMFS management personnel.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 2.5, "Lessons Learned" BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.14 RFS-ERDF-005, *WMFS Administrative Procedure*

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
14.C.4, "Documentation"	ERC WMFS	P	This guideline follows a graded approach and will apply to BHI personnel and to some WMFS management personnel.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 2.5, "Lessons Learned" BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.14 RFS-ERDF-005, *WMFS Administrative Procedure*
14.C.5, "Review"	ERC WMFS	P	This guideline follows a graded approach and will apply to BHI personnel and to some WMFS management personnel.	BHI-FS-01, Vol. 1, Procedure 7.1, "Field Support Training" BHI-MA-02, Procedure 2.5, "Lessons Learned" BHI-MA-02, Procedure 5.2, "ERC Training" 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.14 RFS-ERDF-005, *WMFS Administrative Procedure*
Chapter XV "Timely Orders to Operators"				
15.C.1, "Content and Format"		N	The RAWD does not have production facilities for which periodic instruction or direction is required to ensure continuous production capacity. This guideline is not applicable to the RAWD.	

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
15.C.2, "Issuing, Segregating, and Reviewing Orders"		N	The RAWD does not have production facilities for which periodic instruction or direction is required to ensure continuous production capacity. This guideline is not applicable to the RAWD.	
15.C.3, "Removal of Orders"		N	The RAWD does not have production facilities for which periodic instruction or direction is required to ensure continuous production capacity. This guideline is not applicable to the RAWD.	
Chapter XVI "Operations Procedures"				
16.C.1, "Procedure Development"	ALL	P	The simplicity of waste remediation, disposal, transportation operations and equipment and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	BHI-MA-02, Procedure 1.2, "Preparing and Processing ERC Controlled Manuals and Procedures" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16 Exhibit I, "Submittals," for the following subcontracts: 0600X-SC-G0006 0100C-SC-G0004 0100B-SC-G00010 0600X-SC-G0007 0100X-SC-G0027 0100N-SC-G0058

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
16.C.2, "Procedure Content"	ALL	P	The simplicity of waste remediation, disposal, transportation operations and equipment, and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	BHI-MA-02, Procedure 1.2, "Preparing and Processing ERC Controlled Manuals and Procedures" BHI-FS-01, Vol. 1, Procedure 1.6, "Procedure Development" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16
16.C.3, "Procedure Changes and Revisions"	ALL	P	The simplicity of waste remediation, disposal, transportation operations, and equipment and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	BHI-MA-02, Procedure 1.2, "Preparing and Processing ERC Controlled Manuals and Procedures" RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
16.C.4, "Procedure Approval"	ALL	P	The simplicity of waste remediation, disposal, transportation operations, and equipment and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	BHI-MA-02, Procedure 1.2, "Preparing and Processing ERC Controlled Manuals and Procedures" BHI-MA-02, Procedure 1.3, "Internal Review Documents" RFS-ERDF-005, *WMFS Administrative Procedure* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16
16.C.5, "Procedure Review"	ALL	P	The simplicity of waste remediation, disposal, transportation operations and equipment, and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16
16.C.6, "Procedure Availability"	ALL	P	The simplicity of waste remediation, disposal, transportation operations and equipment, and the absence of equipment-based safety systems do not require the rigor contained in the guideline. The graded approach to the guideline is specified in the implementing documents.	RFS-ERDF-005, *WMFS Administrative Procedure* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16
16.C.7, "Procedure Use"	ALL	P	RAWD personnel will be trained to procedures developed for waste remediation, disposal, and transportation operations. Verbatim compliance is not required except where called for in specific project documents, and there will be no sign-offs in the operational procedures due to the simple nature of operations within the RAWD.	RFS-ERDF-004, *WMFS Training Manual* *RCIE Transportation Operations Manual* 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.16

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
Chapter XVII "Operator Aid Postings"				
17.C.1, "Operator Aid Development"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
17.C.2, "Approval"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
17.C.3, "Posting"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
17.C.4, "Use of Operator Aids"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
17.C.5, "Documentation"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
17.C.6, "Review"		N	RAWD operations do not rely on posted operator aids to assist personnel in the performance of their duties.	
Chapter XVIII "Equipment and Piping Labeling"				
18.C.1, "Components Requiring Labeling"	ALL	P	Most RAWD operations only have circuit breakers, which will be marked per National Electrical Code requirements. The ERDF contains components that are labeled to OSHA standards. The simple nature of the mechanical and electrical systems of the RAWD do not require the level of detail prescribed in this guideline. The graded approach to the guideline is specified in the PMII.	*Construction of W-296 ERDF, Technical Specifications*, Volumes 1 & 2 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.18
18.C.2, "Label Information"	ALL	P	Most RAWD operations only have circuit breakers, which will be marked per National Electrical Code requirements. The ERDF contains components that are labeled to OSHA standards. The simple nature of the mechanical and electrical systems of the RAWD do not require the level of detail prescribed in this guideline. The graded approach to the guideline is specified in the PMII.	*Construction of W-296 ERDF, Technical Specifications*, Volumes 1 & 2 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.18

DOE Order 5480.19, Attachment 1 Guideline	RAWD Site	APP Y/N/P	Basis for Applicability/Deviation	Implementing Documents
18.C.3, "Label Placement"	ALL	P	Most RAWD operations only have circuit breakers, which will be marked per National Electrical Code requirements. The ERDF contains components that are labeled to OSHA standards. The simple nature of the mechanical and electrical systems of the RAWD do not require the level of detail prescribed in this guideline. The graded approach to the guideline is specified in the PMII.	*Construction of W-296 ERDF, Technical Specifications*, Volumes 1 & 2 0000X-PMII-G0004, Rev. 0, RAWD PMII, Section 4.18
18.C.4, "Replacing Labels "	ALL	P	Most RAWD operations only have circuit breakers, which will be marked per National Electrical Code requirements. The ERDF contains components that are labeled to OSHA standards. The simple nature of the mechanical and electrical systems of the RAWD do not require the level of detail prescribed in this guideline. The graded approach to the guideline is specified in the PMII.	RFS-ERDF-002.7, *WMFS Equipment Maintenance Plan* 0000X-PMII-G0004, Rev. 0, , RAWD PMII, Section 4.18

Note: Exhibit G, "Subcontractor Safety & Health Requirements," as modified by "Subcontract Special Conditions" (Exhibit B) for ERC construction subcontracts applies equally to all subcontractors working on the RAWD Project.

Note: DOE's acceptance/approval of the ERDF CONOPS matrix is provided in Hughes 1996a and 1996b, and also Holten 1996.

3.0 REFERENCES

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