

**SECTION J**

**APPENDIX D - THE AMWTP ES&H AUTHORIZATION PROCESS**

**A Process for the Safe and Effective Performance of AMWTP Work  
at the  
U.S. Department of Energy, Idaho Operations Office**

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## AMWTP ES&H AUTHORIZATION PROCESS

### A. PHILOSOPHY, PURPOSE AND INTRODUCTION

The premise upon which the AMWTP believes compliant environment, safety and health activities are ensured is that conscientious environmental practices and worker safety and health is inherent in the good business practices of the Contractor. That notwithstanding, regulatory agencies, including DOE, have the responsibility to verify that environmental, safety and health laws and regulations are followed. ***Simply stated, the Contractor is responsible for achieving compliance with ES&H laws and regulations; regulatory agencies are responsible for monitoring the Contractor efforts in implementing programs to achieve compliance.***

DOE-ID intends to conduct its monitoring of the AMWTP using an approach analogous to a permit, rather than to exercise its regulatory powers through a “police” approach; the permit approach will be consistent with Defense Nuclear Facility Safety Board Recommendations 95-2. The use of the “permit” approach will allow DOE and the Contractor to mutually negotiate the terms of a document that will set out each party’s expectations and limits of conduct, and will provide each party with the assurance that neither DOE nor the Contractor will conduct itself in a manner contrary to the terms in the document unless emergency or extraordinary conditions arise. The document will be known as the ES&H Authorization, and will be co-signed by the Contractor and DOE-ID. The ES&H Authorization will include and incorporate by reference the ES&H Program Operating Plan.

DOE-ID believes that the heart of a compliant, successful ES&H program lies in the quality of the Contractor’s self assessment program. A thorough and rigorous self assessment program will provide the ideal environment for privatization, focusing on Contractor independence, while also assuring that DOE’s legal obligation to protect workers, the public, the environment and the national security is fulfilled. Therefore, when the Contractor initiates the authorization process by preparing and submitting to DOE the draft Requirements Document (discussed in the next section), the Contractor should determine which programs and activities are necessary to achieve and maintain compliance with all ES&H requirements, and should develop a self-assessment method to continually monitor their performance relative to those programs and activities. Assuming the Contractor and DOE agree upon the Contractor’s thorough self-assessment program, DOE-ID expects that semiannual reviews of the Contractor’s self-assessment activities, and an annual ES&H audit of the AMWTP should be sufficient to fulfill DOE’s legal responsibility to assure worker safety and health, protection of the public, and environmental protection. Because the Contractor will be regulated predominantly by agencies other than DOE (e.g. State of Idaho, EPA, and perhaps OSHA and NRC) the frequency and

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scope of assessments and reviews by those other regulators will not be affected by the ES&H Authorization developed through negotiations between DOE and the Contractor.

The objectives of this Authorization Process are (1) to allow the private sector Contractor to accomplish work for DOE-ID in a fair, logical, cost effective and compliant manner, and (2) to allow DOE-ID to satisfy its ES&H responsibilities under the Atomic Energy Act (responsibilities for DOE-ID radioactive and special nuclear materials and responsibilities for the general safety and health of workers on the INEL). Main elements of this AMWTP ES&H Authorization Process are:

1. Identification of Requirements Document

This document forms the start point of the process. The Contractor will draft the Requirements Document from existing laws, regulations, court or consent orders, and DOE Directives with assistance and input as appropriate by DOE. ***The Contractor has the responsibility to develop the Requirements Document; DOE has the responsibility to review the proposed Requirements Document*** and ensure it represents the universe of applicable laws, regulations, court or consent orders, and DOE Directives that will help define the ES&H safety envelope for the project.

**REQUIRED FOR INCLUSION IN REQUIREMENTS DOCUMENT:** The Contractor must include applicable Occupational Safety and Health Administration (OSHA) regulations, environmental laws and regulations, and court or consent order requirements in the Requirements Document. Additionally, DOE Directives which are codified, or in the process of being codified (as discussed later), associated with the Price-Anderson Amendment Act of 1988 (PAAA) must be included in the Requirements Document, unless specifically excluded by exemption. ***It is the intent of DOE to eliminate duplicative and unnecessary requirements that don't enhance the ES&H performance of the AMWTP. Thus, the Contractor ES&H Program Operating Plan (discussed below) will be the basis for any request of exemption from PAAA requirements.*** As of August 1996, DOE Directives which are codified are 10 CFR 820, 830, 830.120, and 835 . Item I below identifies the DOE Directives that are in the process of being codified.

**NEGOTIABLE FOR INCLUSION IN REQUIREMENTS DOCUMENT:** Item I below also contains additional DOE Directives from which the Contractor may or may not want to extract requirements for the Requirements Document. Additionally, the Contractor may identify other applicable or equivalent regulations ( NRC regulations, ANSI standards, UBC codes, etc.) for inclusion in the Requirements Document.

2. AMWTP ES&H Program Operating Plan

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This Plan will be developed during Phase 1 by the Contractor before the start of construction or operations. The Plan will constitute the authorization application for the project, facility or action. It will describe how the Contractor intends to operate during the life of the contract to achieve a high level of ES&H performance in a cost-effective manner and in compliance with all applicable requirements, as identified in the Requirements Document. Guidance on preparation of the Plan is provided in the following pages.

### **3. DOE-ID Review and Approval of the Contractor's AMWTP ES&H Program Operating Plan**

DOE-ID will review the draft AMWTP ES&H Program Operating Plan and provide comments as appropriate. Once the Plan is found to be complete by DOE-ID, both the Contractor and DOE-ID will sign the Plan, and a formal statement of completeness and authorization to commence operations per the contract (Authorization) will be issued by the Contracting Officer. The Plan will become a formal part of the contract. Partial completeness of the Plan may be documented through the Contracting Officer and DOE may provide limited authorization to operate (e.g. permission to start construction, conduct hot testing, or retrieve and transport radioactive materials, assuming that the Contractor has received authority to proceed from all other regulators).

### **4. Oversight by DOE-ID**

The Authorization (which consists of an Authorization Letter from DOE-ID establishing formal authorization conditions, including the co-signed and approved AMWTP ES&H Program Operating Plan) will represent the formal authorization to conduct operations and handle DOE radioactive materials. Therefore, the Authorization will present the requirements from which DOE-ID will conduct oversight of ES&H for the contract.

### **5. Changes to the Authorization**

All changes to the Authorization will be negotiated in advance between DOE-ID and the Contractor and will be resolved prior to being incorporated as a change to the Authorization.

## **B. APPLICABILITY**

This process applies to the work associated with AMWTP, accomplished by the private sector Contractor, for which DOE-ID retains responsibilities for ES&H. The process will be incorporated into the contract.

## **C. FUNCTIONS AND RESPONSIBILITIES**

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1. DOE-ID will:

- a. Provide an up-to-date list of applicable DOE ES&H Directives to the Contractor initiating the AMWTP ES&H Authorization Process.
- b. Select and train, as necessary, a DOE-ID Program staff member to follow the AMWTP ES&H Authorization Process.
- c. Review the Authorization submittal and work with the Contractor to resolve comments and achieve a complete submittal.
- d. Draft an Authorization Letter with formal authorization conditions.
- e. Submit the approved Authorization Letter to the Contractor via the Contracting Officer.

2. The Contractor will:

- a. Develop the Authorization Application in the form of a AMWTP ES&H Program Operating Plan using the guidance provided below. This Plan will describe how the Contractor will achieve appropriate ES&H compliance and performance in a cost effective manner. Specifically, the Plan will indicate which ES&H requirements (Requirements Document) apply to the contract and how the Contractor will implement the specific applicable requirements.
- b. Submit the Authorization Application to DOE-ID for review, comment, resolution and approval.
- c. Resolve, with DOE-ID, pre-authorization issues and comments.
- d. Once the Authorization Letter is received from DOE-ID, operate within the authorization conditions.
- e. Resolve, with DOE-ID, formal deficiencies and violations of any ES&H requirement as reported by the Contracting Officer and/or Contracting Officer Representatives.

D. GENERAL AUTHORIZATION APPLICATION REQUIREMENTS

1. The Contractor will prepare the Authorization Application in the form of an AMWTP ES&H Program Operating Plan. This Plan will follow the general outline as provided in item H. below. The Plan will indicate which ES&H requirements (Requirements

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Document) apply to the contract and how the Contractor will implement the specific applicable requirements.

2. The Authorization Application shall be signed by a Contractor official responsible for ES&H performance and compliance (company president or designee) and certified to be truthful, complete and accurate.
3. The Authorization Application should be submitted with sufficient time, prior to the scheduled start of construction and/or operations, to allow DOE-ID to carefully review the document, provide and resolve comments, and achieve final approval.

### E. AUTHORIZATION APPROVAL BY DOE-ID

DOE-ID will review and comment on the Authorization Application (AMWTP ES&H Program Operating Plan) received from the Contractor. Once the Authorization Application is found to be sufficient by DOE-ID, the Contractor will sign the Application as the AMWTP Owner, and DOE-ID will co-sign as the regulator. A formal Authorization Letter will be prepared by DOE-ID and submitted to the Contractor by the Contracting Officer. This Authorization Letter, which will include the AMWTP ES&H Program Operating Plan, will provide formal permission from the DOE-ID to handle radioactive materials. Again, partial completeness of the Plan may be documented through the Contracting Officer and provide limited authorization to operate (e.g. permission to start construction, conduct hot testing, or retrieve and transport radioactive materials, assuming all other regulatory requirements are satisfied and the other regulators have granted permission to proceed). The Authorization is expected to last the life of the project, with changes to the Authorization being made as discussed in item A.5. above.

### F. OVERSIGHT OF ES&H ACTIVITIES

Oversight of the Contractor's ES&H operations and performance will be conducted as identified below. Oversight will be limited to the conditions identified in the Authorization. Specific oversight and deficiency/violation response provisions will be identified in the Authorization. Failure of the Contractor to maintain formal authorization conditions or properly respond to deficiencies identified by oversight may result in loss of the Contractor's authorization to handle radioactive materials for DOE, and may be considered as a breach of the contract. The following specific conditions will apply.

1. Environmental Activities: Environmental activities associated with the AMWTP will be controlled and monitored by the State of Idaho or EPA via normal permitting mechanisms between the regulator and the Contractor. DOE-ID reserves the right to conduct unannounced visits to observe the operation of the Contractor to meet RCRA waste owner

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responsibilities (e.g., ensuring RCRA waste is being handled and treated in accordance with regulations). Such visits are not expected to be more than twice yearly.

The air permit for the AMWTP and the use of DOE-ID's water rights will be exceptions to the above statement. Because DOE-ID has one air permit between the State of Idaho and DOE covering the whole INEL, all facilities on the INEL impact the air permit. If the AMWTP is on the INEL, its emissions could potentially impact all other facilities on the INEL. Therefore, in the case of air emissions only, DOE-ID will require the following from the AMWTP Contractor if the facility is located on the INEL:

- a. The AMWTP Contractor must copy DOE-ID on all correspondence with, and reports to the State of Idaho and EPA concerning the AMWTP air permit. Additionally, the Contractor must respond to concerns that may arise due to DOE-ID review of supplied documentation.
  - b. The AMWTP Contractor must allow DOE-ID to be an observer/participant in all negotiations with the State of Idaho and EPA concerning the AMWTP air permit. DOE-ID will be observing to ensure that the interest of the other INEL facilities is not impacted by the AMWTP air permit, and DOE-ID participation will be limited to concerns on impact to the overall INEL air permit.
  - c. DOE-ID will conduct an annual surveillance of the AMWTP activities associated with the AMWTP air permit in order to verify AMWTP activities are compliant with the permit, and therefore will not impact other INEL facilities.
2. Worker Health and Safety: DOE is responsible for non-radiological Occupational Safety and Health (OSH) for on site, DOE regulated facilities. However, DOE can pursue a Memorandum of Understanding (MOU) with the Department of Labor (DOL) to transfer regulatory authority for non-radiological OSH from DOE to DOL. Upon request of the AMWTP Contractor, DOE will pursue an MOU with DOL to transfer regulatory authority from DOE to DOL for non-radiological OSH.

If the establishment of an MOU is successful, or if non-radiological OSH oversight is transferred from DOE to DOL via direction from DOE-HQ, non-radiological OSH activities for the AMWTP will be under the regulatory authority of DOL, in accordance with OSHA regulations. However, the Contractor must copy DOE-ID on any reports that are sent to OSHA.

If an MOU is not pursued, or is unsuccessful, DOE-ID will monitor non-radiological OSH in accordance with the following:

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- a. Non-radiological OSH requirements will be as stated in the AMWTP Contractor's ES&H Program Operating Plan, which the Contractor will develop from OSHA regulations (e.g., 10 CFR 1910 and 1929), and applicable portions of DOE Directives (as identified in the ES&H Program Operating Plan Requirements Document).
  - b. The AMWTP Contractor's OSH program will be explained in the Contractor's ES&H Program Operating Plan, and will be approved by DOE-ID via the ES&H Authorization Process.
  - c. DOE-ID will review the AMWTP Contractor's non-radiological OSH self assessment program semiannually, and will conduct an audit of the program annually.
  - d. Any OSHA reportable occurrences (fatalities, serious injuries, etc. as identified in the ES&H Program Operating Plan) shall be reported to DOE-ID. The Contractor will invite DOE to be an observer on any resulting investigations, and will copy DOE on any reports resulting from OSHA reportable occurrences. If DOE-ID needs to conduct an investigation of an OSHA reportable occurrence, the Contractor shall support the DOE investigation by providing access to facilities, supplying requested documents, and making employees available for interviews.
  - e. If at any time DOE believes work conditions are unsafe at the facility, DOE will request that the Contractor stop work activities until the situation is resolved. ***DOE has the right to invoke contract clause H.15, "STOP-WORK AND SHUT DOWN AUTHORITY-ENVIRONMENT, SAFETY AND HEALTH," if DOE believes AMWTP activities cannot be safely accomplished.***
3. Nuclear and Radiological Safety and Health: DOE is solely responsible for ensuring that nuclear and radiological safety of workers and the public is achieved by the Contractor. Because few laws and regulations exist related to nuclear and radiological safety, DOE Directives provide a useful source of information for the Contractor in the development of the Requirements Document and resulting ES&H Operating Plan. DOE-ID will control and monitor nuclear and radiological safety in accordance with the following:
- a. Nuclear and radiological safety requirements will be as stated in the AMWTP Contractor's ES&H Program Operating Plan, which the Contractor will develop from existing law, regulations, court and compliance orders, and DOE Directives. The goal is to identify those requirements which are necessary and sufficient to ensure nuclear and radiological safety.
  - b. DOE-ID will review and approve the Contractor ES&H Operating Plan, which certifies that DOE-ID believes the Contractor has identified the necessary programs and controls to achieve sufficient nuclear and radiological safety.

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- c. DOE will conduct semiannual reviews of the Contractor's self assessment programs in nuclear and radiological safety, and will conduct an annual audit of nuclear and radiological safety.
- d. The Contractor shall report any serious violations of nuclear and radiological safety (criticality, over exposures, losses of radioactive material, etc., as identified in the ES&H Program Operating Plan) to DOE-ID. The Contractor will invite DOE-ID to be an observer on any resulting investigations, and will copy DOE-ID on any resulting reports. If DOE-ID needs to conduct an investigation of the situation, the Contractor shall support the DOE-ID investigation by providing access to facilities, supplying requested documents, and making employees available for interviews.
- e. If at any time DOE-ID believes work conditions are unsafe at the facility, DOE-ID will request that the Contractor stop work activities until the situation is resolved. ***DOE has the right to invoke contract clause H.15, "STOP-WORK AND SHUT DOWN AUTHORITY-ENVIRONMENT, SAFETY AND HEALTH," if DOE believes AMWTP activities cannot be safely accomplished.***

**G. INTERFACE BETWEEN THE AMWTP ES&H AUTHORIZATION PROCESS AND OTHER PERMITS/LICENCES**

DOE-ID recognizes that other permits/licences, such as for RCRA and TSCA, will be issued to the Contractor by the appropriate regulators. Conditions and provisions of these permits/licences need not be duplicated in the AMWTP ES&H Authorization Process. However, they should be listed and discussed as part of the AMWTP ES&H Program Operating Plan.

**H. GENERAL OUTLINE OF THE AMWTP ES&H PROGRAM OPERATING PLAN**

Notes: This outline is provided as guidance in developing the AMWTP ES&H Program Operating Plan. It is intended to aid in the Contractor's development of the AMWTP ES&H Program Operating Plan which, when approved by DOE-ID, will represent formal authorization to handle DOE radioactive materials.

Parts A, B and C of the Plan, as outlined below, are to contain general authorization information. Specific Authorization conditions are provided in Part D. All applicable requirements as identified in the Requirements Document shall be used to develop the specific contract authorization conditions in Part D. Each Part D section should clearly indicate which requirements were used, and are satisfied by the specific Authorization conditions contained in the specific Part D sections.

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Specific Authorization conditions from other permits/authorizations (such as RCRA & TSCA) should be referenced but not duplicated in this Plan. In the event that other Contractor permit/authorization conditions will satisfy specific ES&H requirements (e.g. the RCRA permit Contingency Plan may satisfy emergency response and reporting requirements), duplicate authorization conditions need not be established in this Plan.

**Part A - General**

1. Title
2. Table of Contents
3. Purpose
4. Statement of Management Commitment to ES&H
5. Worker Involvement in ES&H Performance and Improvement
6. Listing of Requirements Document used in Developing this Plan
7. Roles and Responsibilities under the Authorization

**Part B - Facility and Process Description**

1. Description of Work Processes Covered by the Contract.
2. General Facility Description
3. Schedule for Facility Construction, Testing and Operation.
4. Description of Engineered Safety System

**Part C - Interface with other Permits, Authorizations and Agreements**

1. RCRA Permit
2. Air Operating Permit
3. Interface Agreements with Other INEL Contractors

**Part D - Specific DOE ES&H Authorization Conditions**

1. Radiological Controls
2. Nuclear Criticality Controls

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3. Safety Analysis Report and Process
4. Worker Safety and Health
5. Permission to Commence Operations and Stop Work Authority
6. Facility, Construction, and Fire Safety
7. Training and Qualification
8. Environmental Protection and Monitoring
9. Contingency/Emergency Planning and Response
10. Continuous Improvement Process and Response to Internal and External Audits
11. Records and Reports
12. Supporting ES&H Documents, Manuals and Agreements
13. Facility Security
14. Conduct of Operations
15. Radioactive Waste Management
16. Hazards Analysis and Control

**I. APPLICABILITY OF DOE ES&H DIRECTIVES**

Notes: DOE is continuing to refine and renew its Directives System with the objective of reducing unnecessary, redundant and burdensome Directives and portions of Directives. As a result, this list may change prior to contract award and during contract performance. However, significant changes to DOE ES&H Directives made after contract award shall apply to contract performance only when incorporated into a bilateral modification to the contract.

The following list is divided into two sections. Section A presents directives DOE-ID believes contain requirements that must be included or specifically exempted (PAAA invoked directives) in the ES&H Program Operating Plan. Section B presents other directives which may not be specifically applicable to the AMWTP contract, but which may contain concepts and ideas which could enhance ES&H surety.

Section B is not an all inclusive list of applicable DOE Directives, and is provided only to give insight on circumstances where portions of directives may be applicable vice invoking a whole directive. DOE-ID believes that the Contractor is best able to identify the hazards involved in their operation, and is responsible for including the

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necessary requirements in their ES&H Program Operating Plan to mitigate those hazards. Thus, because the actual applicability of DOE ES&H Directives and portions of Directives is dependent on final facility design, the nature of operations, process details, and the inclusion of equivalent controls from law, regulations, codes, etc. into the Requirements Document, the level of implementation of the following Directives into the ES&H Program Operating Plan is negotiable. As previously stated, an exemption can be requested for applicable Directive requirements which are the subject of PAAA and are intentionally excluded from the Requirements Document.

Some of the Directives on this list contain reference to DOE Manuals which also contain potentially applicable requirements and should be considered.

**A. DIRECTIVES WHICH WILL REQUIRING INCLUSION IN THE ES&H PROGRAM OPERATING PLAN OR DOCUMENTED EXEMPTION**

<b>DOE DIRECTIVES IN PROCESS OF CODIFICATION SUBJECT TO PAAA</b>	
<b>NO.</b>	<b>SUBJECT</b>
10 CFR 830.110	SAFETY ANALYSIS AND REVIEW
10 CFR 830.112	UNREVIEWED SAFETY QUESTIONS
10 CFR 830.310	CONDUCT OF OPERATIONS AT DOE NUCLEAR FACILITIES
10 CFR 830.320	TECHNICAL SAFETY REQUIREMENTS
10 CFR 830.330	TRAINING AND CERTIFICATION
10 CFR 830.340	MAINTENANCE MANAGEMENT
10 CFR 830.350	CATEGORIZATION, NOTIFICATION, REPORTING AND PROCESSING OF OPERATIONAL OCCURRENCES AT DOE NUCLEAR FACILITIES
10 CFR 834	RADIATION PROTECTION OF THE PUBLIC AND ENVIRONMENT
<b>DOE DIRECTIVES PLANNED FOR CODIFICATION SUBJECT TO PAAA</b>	
DOE 0 210.1	PERFORMANCE INDICATORS AND ANALYSIS
DOE 0 425.1	STARTUP AND RESTART OF NUCLEAR FACILITIES
DOE 5480.28	NATURAL PHENOMENON HAZARD MITIGATION

<b>DOE DIRECTIVES IN PROCESS OF CODIFICATION SUBJECT TO PAAA</b>	
<b>NO.</b>	<b>SUBJECT</b>
DOE 5480.7A	FIRE PROTECTION
DOE 5480.24	CRITICALITY SAFETY

**B. EXAMPLES OF DOE DIRECTIVES WHICH MAY CONTAIN BENEFICIAL REQUIREMENTS**

The following list of DOE Directives is not intended to be all inclusive nor is it intended to delineate requirements. It is incumbent upon the Contractor to determine which requirements are necessary and sufficient to mitigate the hazards involved in their operations.

**1. DOE 151.1; Comprehensive Emergency Management System**

Because DOE has a legal obligation to respond effectively and efficiently to operational and energy emergencies on site to protect workers, the public, the environment, and the national security, the Contractor is required to submit the following information to DOE:

- A) The Contractor's identification of potential hazards and threats at its facility, and its plan for hazard mitigation, including its emergency preparedness activities, and the acquisition of necessary emergency response equipment;
- B) The Contractor's development and preparation of emergency plans and procedures, including the identification of personnel and resources needed for an effective response, and notification to DOE, local, state, Tribal, and other federal agencies when an operational emergency has occurred;
- C) The Contractor's plan for notifying DOE regarding national security threats or other events or conditions requiring DOE's assistance, expertise, resources, assets, personnel and/or facilities; and
- D) The Contractor's plan to provide accurate, candid, and timely information about emergencies to DOE, the workers and the public.
- E) In the event of an emergency, the Contractor may begin mitigative, cleanup and restoration activities prior to response termination; however, the Contractor will

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closely coordinate overall recovery activities between the Contractor, DOE, other contractors on the Site, and local and state agencies, when appropriate.

**2. DOE 420.1; Facility Safety**

- A) “Nuclear and Explosives Safety Design Criteria” paragraphs should remain applicable to this facility regarding those parts that are applicable to nuclear facilities, but can exclude those clauses that are specific to explosives safety.
- B) “Fire Protection” paragraphs should be applied to the AMWTP
- C) “Nuclear Criticality Safety” paragraphs are all applicable to the AMWTP
- D) “Natural Phenomena Hazards Mitigation” paragraphs are applicable, with the exception of 4.4.3, “Evaluation and Upgrade of Existing DOE Facilities.”

The above could be handled by incorporating the verbatim language of the Contractor Requirements Document paragraphs directly into the contract, or merely obligate by reference to these sections.

**3. DOE 460.1; Packaging and Transportation Safety**

- A) In the event that the Contractor seeks an exemption for packaging from any DOE requirement, the Contractor must provide a written request for exemption to DOE-ID, which must contain information discussing the following: 1) the exemption is not prohibited by any law or regulation; and 2) the requested exemption does not present any undue risk to public health and safety, the environment, or the workforce;
- B) In addition to the packaging requirements stated above, the Contractor offering for transportation a Type B and/or fissile quantity of radioactive materials also must use a packaging certified by either the NRC or DOE, and only under the conditions specified in the certificate of compliance.

**4. DOE 460.2; Departmental Materials Transportation and Packaging Management**

- A) Contractor shall agree not to accept the shipment of hazardous wastes to the AMWTP without notifying and coordinating with DOE;
- B) Contractor shall agree that when shipments are received at the AMWTP, either from an offsite source or an onsite source, the Contractor has the obligation to

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inspect the shipment upon receipt for damage or loss, and report any evidence of leakage to DOE; radioactive materials shipments shall also be inspected for external surface contamination in accordance with either DOT/NRC standards for offsite or public road shipments, or the DOE Radiation Control Manual standards for onsite shipments;

- C) Contractor shall be obligated to detain the transport vehicle, if it is contaminated, and to immediately notify the delivering carrier and DOE.

**5. DOE 5400.1; General Environmental Protection Program**

- A) The Contractor is responsible for sufficient environmental monitoring of radioactive materials within the boundaries of its facility and site, including effluent monitoring of air and water, ambient air quality monitoring, and groundwater monitoring;
- B) The Contractor shall be responsible for assuring and maintaining records on radioactive materials monitoring data verification, laboratory certification, and any other quality assurance procedures considered by the Contractor to be necessary to insure the integrity of the radiological monitoring activities;
- C) The Contractor is responsible for informing DOE on a regular basis of environmental issues that are of significance to DOE, as well as routine reporting to DOE of significant environmental protection information, if applicable;
- D) The Contractor is responsible for compliance with all applicable "Mandatory Environmental Protection Standards" as set out in Attachment I-1 to DOE Order 5400.1;
- E) The Contractor is responsible for timely notification to DOE-ID of unusual, off-normal and/or emergency environmental occurrences or events during the AMWTP;
- F) The Contractor shall be responsible for providing effluent and monitoring data to DOE on a routine basis for use in the annual site environmental report;
- G) The Contractor is responsible for timely notification to DOE of any unplanned releases of radioactive materials in effluents, such as spills, leaks, and other similar releases;

**6. DOE 5480.8A; Contractor Occupational Medical Program**

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Portions of the Directive which are redundant to OSHA requirements need not be referenced, but portions that are specific to radiation exposure are applicable.