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## CBDPP I&M Committee Meeting Minutes

February 9, 2012

2430 Stevens / CR 297

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### ATTENDEES:

Darrell Riffe	Scott Seydel
Lisa Hart	Randy Phenneger
Karen Phillips	Emily Millikin
Larry Sherman	Joseph Samuels
Thomas Morris	Chuck Wildman
Josh Artzer	Shad Smith
Terry Krietz (DOE-HQ EM)	Colby Smith
Mike Stoner	Robin Domina
Michele Solano	

### INTRODUCTIONS:

Terry Krietz from Office of Environmental Management in Washington, D.C. and is here to observe the CBDPP Committee.

### SAFETY TOPIC:

- For close to the last week, about a mile north of the Wye Barricade, there's about 30 head of Elk that are crossing the roadway out there. Drive carefully, and stay alert to avoid hitting any of them.
- There are special patrol units out on the highways and they are cracking down on speeding. Drive the speed limits to avoid tickets.

### NEW BUSINESS:

- **BHSC Risk Communication Subcommittee conference call at 8:00am – 9:00am.**
  - No committee members plan to attend this call
- **Quorum:**
  - Larry Sherman representing HAMTC Health Advocate for Kirk Domina
  - Chuck Wildman representing Mark Fisher for the Beryllium Awareness Group
  - Larry Sherman representing Bob Legard for Building Trades
  - Quorum achieved
- **Beryllium Inbox**
  - No new questions have been received in the Beryllium Inbox.
  - Response to last question was sent out last week.

- **Training Report**
  - Training is ready to go for BWP courses as soon as they get direction from DOE. This includes the GAP training for Beryllium Workers as well as IH/IHT training.
    - Verification as to what happens to workers who do not pass the test at the end of the training. If a worker does not pass the final exam, and it can't be remediated within the class, meetings will be held with the worker, the worker's manager and instructors to ensure that worker does not work within a BWP if they do not pass the exam. It is not job jeopardy, but a remediate process, and this follows the HAMMER training process.
  - Training is waiting for the procedures to be finalized to continue on with training.
  - Learning Objectives for Beryllium Program Update Module 2 for associated workers were reviewed.
    - This course is specifically for associated workers who do not work in, but work outside the BCA/BRA supporting work being done under a BWP. The associated worker will be trained to understand their responsibilities for activities outside a BCA/BRA, a brief instruction on the BWP, and responsibilities for reviewing the BWP and signing the acknowledgment record.
    - This training is very small content and will be delivered via CBT - web-based treatment
    - Requested verification to proceed into development.
      - ❖ Committee approved Training to proceed into development for this training.
  
- **Resolution Forms**
  - DOE-0342-001 – BWP Procedure – Update to language in section 2.4 and 3.0
    - HAMMER noticed inconsistent language within difference sections in the document.
    - Product team recommends clarifying for consistency, the requirements for eligible BWP worker as well as took the training requirements language from the Postings procedure.
    - SWS requests Chair/Co-Chair confirmation as to whether this is a major or minor change. Once that is decided, DOE will need to verify whether this is a significant or non-significant change to determine if new signatures are needed on DOE-0342-001.
      - ❖ DOE agrees this is a non-significant change
    - Chair called for vote on approval of resolution form.
      - ❖ Committee approved this resolution form.
  
  - DOE-0342-002 – Assessment & Characterization/Verification.
    - There are three definitions that were modified in this procedure that differ from the original language in DOE-0342.

- ❖ Committee clarified and changed language in the resolution form to match the procedure language to say "...at or above the control level."
- Definitions were added that were not originally in DOE-0342.
  - ❖ Anthropogenic Beryllium
  - ❖ Beryllium Material Area (BMA)
  - ❖ Beryllium Suspect Area (BSA)
  - ❖ Control Level
  - ❖ Demolished Beryllium Facility Site
  - ❖ De-Posting
  - ❖ Down-Posting
  - ❖ Electrical Distribution Equipment (EDE)
  - ❖ Facility
  - ❖ Location of Concern
  - ❖ Restricted Access Area
  - ❖ Test Critical Value (TCV)
  - ❖ Trigger Level
  - ❖ Underground Beryllium Area (UBA)
  - ❖ Up-Posting
- SWS asked that the language for definitions be compared to the individual procedures they came from to ensure the language is exactly the same.
- Chair asked DOE representative for clarification on what constitutes 'ready to implement'.
  - ❖ DOE confirmed it is when the resolution form is signed.
  - ❖ Chair will review the definition language and will provide it to the Committee to review at the 2/16/12 CBDPP Committee meeting.
    - Committee agreed to this path forward.
- Modifying section 6.6.1 to point to DOE-0342-002
- Modifying section 6.11.7 to adjust the language to remove unnecessary direction to be consistent with the approach that the sampling is done with the applicable Site wide procedure and the analysis is done by the appropriate lab with the appropriate method
- Added a note to section 6.14 explaining the difference between finding samples above the trigger level, but not above the control level, and it points to DOE-0342-002 for further information.
  - ❖ Consensus of the product team and the BeCAP Core team was that a BWP was not necessary, but that housecleaning for these types of samples will be left up to the individuals with the understanding that the scenario will be communicated to the worker, and the worker will have the ability to choose whether they want to participate in that housekeeping.

- Two sections were deleted:
      - ❖ Section 6.11.6: Bulk/Dust and Soil Sampling
      - ❖ Appendix A: Facility Characterization Process for Beryllium
- Applicability of 10 CFR 850 and 10 CFR 851 to CBDPP
  - A Site wide team started working on this as a discussion on Leased Facilities.
  - This resolution has a lot of detail, and the Committee requested time to review this resolution form before voting.
  - Chair reviewed the tables on page 3 of the resolution form, as those will become Appendix D.
  - Footnote 1
  - Footnote 2 – the issue is that for work on DOE sites, it says that you shall comply with your health and safety plan or that of the controlling organization of that Site. The default is that you shall comply with the Hanford Site CBDPP. If a worker is doing work at PNNL, and their statement of work says that they will work to PNNL’s CBDPP, then the Hanford Site CBDPP no longer applies. However, the point is that the understanding is that the Hanford Site CBDPP is the default.
  - Clarification made to language about QA staff being temporarily assigned to a sub-contractor’s manufacture facility, the QA staff’s contractor will now be expected to ensure compliance with worker protection requirements. The contractor would have to do hazard analysis to determine if there is a potential hazard of beryllium. But if you can do the hazard analysis, and no beryllium is used, at that point you’re done.
    - ❖ DOE confirmed that 10 CFR 851 doesn’t apply if it isn’t a DOE facility, they do not want our worker protection procedures to stop at the gate of a subcontractor facility, as we’re still responsible for protecting that worker.
    - ❖ DOE is working with their attorneys and Office of General Council to make sure the language is appropriate
    - ❖ WCH would like to review this with their legal department to review the language as well
  - Chair will put this on the agenda for the 3/1/12 CBDPP Committee meeting, as this resolution form will be discussed at the Vice President Monthly Beryllium Meeting on 2/24/12

- Definition of “Full Body PPE” in section 6.17 of DOE-0342, Rev. 1
  - Summarizes the discussion held in the CBDPP Committee to define full body PPE and recommends adding a note to section 6.17 outlining the elements of full body PPE.
  - Committee recommended also adding definition of “Full Body PPE” to section 3.0: *Definitions* in DOE-0342. Change was made in real time to the resolution form.
  - This resolution is on hold until the BeCAP team works on donning/doffing procedures.
  
- **New Regulations/Interpretations**
  - Asked T. Krietz for an update on the 10 CFR 850 revision.
    - HSS gave the program offices the revision of 10 CR 850. NNSA and Science are still negotiating with HSS, and can’t move forward until the issues have been resolved.
    - Predicts that the public notice to the Sites would be late spring.
  - In March 2012, HSS is holding a meeting at EFCOG to discuss possible changes to 10 CFR 851.
  
- **DOE Interim Actions**
  - Chair asked DOE if this needs to continue to be a standing item on the agenda.
    - DOE concurs that this can be removed.
  
- **Lessons Learned**
  - None reported.
  
- **Issues in the Field**
  - L. Sherman asked for clarification as to when the BWP communication will be issued.
    - WCH met with their communications team, and they haven’t received any instruction from the DOE communications team.
    - MSA cautioned on sending out a communication too soon, as there are still a lot of steps to complete before the BWP is ready to go (Letters sent from DOE-RL/ORP, Contractors respond, DOE issue implementation date.)
    - Committee agrees that the communication for BWP needs to be reviewed.
      - Chair will call a meeting with the communications subcommittee, including Geoff Tyree to review this communication prior to the 2/16/12 CBDPP Committee

- Dr. Phillips recommended reviewing any other communications for other products that have gone through the 90%. L. Sherman will send all communications to M. Solano to be discussed at the Communications Subcommittee meeting.
- **CBDPP Subcommittee (Company Level) Discussion:**
  - MSA: Meeting held today. HAMTC reps on the subcommittee requested adding training on the resolution form process so that workers understand how it works when they look at DOE-0342 and see a resolution form, to train them so they understand they have to work to any resolution forms if they are posted.
    - Rather than training, Committee would like to explore if it can be sent out in a communication. This will be discussed at the meeting with the Beryllium Communications Subcommittee.
    - HAMMER could cover this in training, but they recommend adding language early in the procedure explaining the resolution process, as often times, small training topics like this, don't always stick with the trainees.
  - WCH: Met 2/8/12, a lot of members were absent. Issues raised were already addressed in today's meeting. Discussed a need to publish a list of Beryllium Health Advocates on the website.
    - Wildman would like to see links to former worker programs as well, so help direct people to the correct information.
    - J. Samuels requested emails explaining changes to beryllium website.
  - CHPRC: Met last week, and Seydel is writing a letter to all managers of the Subcommittee members to get consistent attendance. If there is still low attendance at the next meeting, Seydel will discuss with the VP.
  - WRPS: Next meeting is 2/16/12. Nothing to report.
    - Stoner requested C. Smith ensure S. Smith and M. Stoner are on the meeting notice for this meeting.
  - CSC: Only meeting quarterly, nothing new to report.

#### **AROUND THE TABLE:**

##### **Terri Krietz**

- Recommends looking at OSHA's website to see how they manage changes/interpretations to standards, and might use that as an example of how to show the changes to DOE-0342.

##### **Lisa Hart**

- The recent changes to the BWP form and the Acknowledgment record have been incorporated into the training. A change log has been created to show the changes made, and asked if the Committee would like to see the change log.
  - Committee agreed seeing the change log was not necessary.