

Clarification & Guidance
DOE-0342 Chronic Beryllium Disease Prevention Procedure

Proposed Reviewed Rejected Accepted Approved for Use Procedure Updated Complete N/A

ID Number: **Title/Subject:** DOE-0342 Revision 1 Implementation, Sections 6.7, 6.8 and Attachment 3

Initiated by: Darrell J. Riffe **Company:** MSA **Date:** 6/14/2012 **Ph #:** 376-0596

Issue/Concern/Affected Step(s):

- DOE-0342 Revision 0, Section 6.7, Beryllium Work Permit (BWP) and Attachment 3
- DOE-0342 Revision 0, Section 6.8, Hazard Assessment
- DOE-0342 Revision 1, Section 6.7, Hazard Assessment and Attachment 3

DOE-0342, Revision 0 requires the use of the BWP described in Attachment 3, whereas DOE-0342 Revision 1 requires the use of the process and forms described in the newly developed DOE-0342-001, *Hanford Site Beryllium Work Permit (BWP) and Hazard Assessment Procedure*. During the implementation period for DOE-0342, Revision 1 and implementing procedure DOE-0342-001, contractors will require flexibility to utilize the existing process defined in DOE-0342, Revision 0, as well as transition to the new BWP process defined in DOE-0342 Revision 1. As such, contractors will require the ability to utilize the old process and forms and the new process and forms during the implementation period.

Discussion:

The first revision of DOE-0342 includes implementing procedure DOE-0342-001, *Hanford Site Beryllium Work Permit (BWP) and Hazard Assessment Procedure*. Hanford Prime Contractors have determined to proceed with implementation of Revision 1, and will achieve full implementation by July 30, 2012. DOE-0342 Revision 0 establishes the use of a Beryllium Work Permit (BWP) as defined in Attachment 3 to implement and standardize controls for all work activities in beryllium-regulated areas and beryllium-controlled areas. DOE-0342 Revision 1 establishes a more prescriptive process and new forms through direct reference to the new DOE-0342-001 implementing procedure.

During the period of transition from the old BWP defined in DOE-0342 Revision 0 to the new BWP process and forms defined in DOE-0342 Revision 1, contractors will need the ability to use the old BWP form and process defined in Appendix 3 of DOE-0342 Revision 0, while still retaining the ability to utilize the new process defined in DOE-0342-001. Without such flexibility, all forms, hazard assessments, and work package modifications would have to transition in a single day period, which would result in undue disruption.

Recommended Resolution:

Update Section 6.7 of DOE-0342 Revision 0, as noted below.

Existing:

6.7 BERYLLIUM WORK PERMIT (BWP)

A BWP (Attachment 3, *Hanford Beryllium Work Permit*) is required for all work conducted in a BRA or BCA. A BWP shall be developed as part of the hazard assessment process (Section 6.8) when work is to be performed in a BRA or BCA. The BWP shall be coordinated with other safety, health, and radiological control documents to ensure a consistent approach to work controls.

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The BWP documents the specific requirements for a task. The BWP communicates the beryllium hazards associated with the work, postings/labeling, required PPE, entry requirements, types of sampling to be conducted, as well as other specific information necessary to conduct the work in accordance with this Program. In addition, the BWP will be referenced in the Pre-Job Briefings to reinforce the information necessary to conduct work safely. The BWP shall be revised whenever there is a change in the work, beryllium hazards, postings or other information on the BWP. This BWP shall be reviewed and updated as required, to reflect field changes when changes occur in the field that could affect the validity of this completed form and the Job Hazards Analysis (JHA) it supports. Any revisions to the BWP shall be communicated to employees involved in the activity covered by the BWP prior to commencing work.

Proposed Language:

6.7 BERYLLIUM WORK PERMIT (BWP)

Contractors have started implementation of a new BWP process through use of an implementing procedure (DOE-0342-001, *Hanford Site Beryllium Work Permit (BWP) and Hazard Assessment Procedure*). The new BWP process will require the use of a Hanford Beryllium Hazard Assessment Form (A-6005-852), Hanford Job Specific Beryllium Work Permit (BWP) (A-6006-202), Hanford Beryllium Hazard Assessment Review Record (A-6006-117), and Hanford Job Specific Beryllium Work Permit Acknowledgement Form (A-6005-853).

During the period in which contractors are implementing Revision 1 of this Program, the contractor(s) may elect to do the following:

- Follow the BWP process defined in Section(s) 6.7 and 6.8 (below),

and/or
- Follow the BWP process defined in DOE-0342 Revision 1 as approved by DOE. BWP's prepared utilizing the Revision 1 process must adhere to that process.

After the effective date of Revision 1 of DOE-0342, contractors must fully adhere to the BWP process defined in DOE-0342 Revision 1.

A BWP (Attachment 3, *Hanford Beryllium Work Permit*) is required for all work conducted in a BRA or BCA. A BWP shall be developed as part of the hazard assessment process (Section 6.8) when work is to be performed in a BRA or BCA. The BWP shall be coordinated with other safety, health, and radiological control documents to ensure a consistent approach to work controls.

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