Clarification & Guidance
DOE-0342 Chronic Beryllium Disease Prevention Procedure

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

Title/Subject: Functional Definition of "Job Specific" BWP – with additional clarification

Initiated by: Scott Seydel, CIH **Company:** CHPRC **Date:** 7/26/2012 **Ph #:** 373-4860

Issue/Concern/Affected Step(s):
This resolution form is an updated version of an approved Resolution Form. This Form provides additional clarification to the terms "common hazard basis" and "common ventilation system".

While DOE-0342-001, *Hanford Site Wide Beryllium Work Permit (BWP) and Hazard Assessment Procedure* includes a definition of "job specific", additional clarity is needed to address questions that have been raised during training regarding the requirements.

Discussion:
Section 4.3.1 of DOE-0342-001 states that:

> For the purpose of this Procedure, job specific means a well defined and explained specific work activity within a specific BCA/BRA.

During Beryllium Worker Gap training there have been requests by the attendees to further define what is job specific and what constitutes a single BCA. Some of the attendees mistakenly believed that the current definitions meant that there would be hundreds (if not thousands) of BWP's required for each beryllium controlled facility.

The intent of the job specific BWP is to ensure that all beryllium hazards are identified and adequate controls are implemented for the work being performed. If a single BWP and hazard assessment can meet these expectations, there is no reason to unnecessarily create additional paperwork by requiring multiple BWP's.

Recommended Resolution:
The following interpretation shall apply in the implementation of the requirements of DOE-0342-001:

For a BWP to be job specific:

- All activities covered by the BWP are performed within a single BCA/BRA
- The hazard assessment explicitly discusses the activities that will be performed
- There is a single beryllium hazard control set (i.e. "If beryllium condition "A" exists, then wear one pair of coveralls. If beryllium condition "B" exists, then wear two pairs of coveralls" is not allowed.)

  NOTE 1: *This does not apply to specific controls implemented due to RadCon or Electrical Safety requirements.*

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In addition to the above requirements, specifically identified rooms/areas meeting the following requirements may be considered a single BCA/BRA for the purposes of the BWP process:

1. The single BCA/BRA with multiple rooms/areas shall be in the same facility or interconnected facilities (with common ventilation and access/egress).
2. The Hazard Assessment/BWP for a single BCA/BRA with multiple separate rooms or areas shall clearly identify and document the common hazard basis shared by the rooms/areas included in the single BCA/BRA
3. A Site Condition Walk-Down of all areas shall verify the validity of the common hazards.
4. The specific rooms/areas to be combined under a single BCA/BRA shall be clearly defined in the Hazard Assessment.

NOTE 2: *Interconnected facilities* ***(separately identified but physically adjoined)*** *that were designed with a common ventilation system are considered to have a common ventilation system regardless of whether the system is:*

- *Operational*
- *Shut down for any reason*
- *Dismantled and/or removed*

NOTE 3: *Separate rooms or areas are considered to have a common hazard basis if they have similar:*

- *Conditions*
- *Potential for exposure*
- *Required exposure controls*

Existing:
See above

Clarification☐ Guidance■ :

Resolution Completion Plan/Summary:
This Resolution Form supersedes Resolution Form #18.

These interpretations shall be in effect upon implementation of DOE-0342-001 rev. 0. No revision to DOE-0342-001 shall be made at this time. During preparation of revision 1 of DOE-0342-001, it shall be determined whether some or all of these interpretations should be incorporated into the procedure.

Remarks:

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Status:

Reviewed	Committee Chair	Scott Seydel	Date	7/26/12
Rejected	Committee Chair	N/A	Date	
Accepted	Committee Chair	Scott Seydel	Date	7/26/12
Concurrence/ Approved	DOE-RL	Peter J. Garcia Jr	Date	7/26/2012
Concurrence/ Approved	DOE-ORP		Date	26 Jul 12
Approved For Use	Committee Chair		Date	
DOE-0342 Updated	Committee Chair		Date	