

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:** **Intrusive Activity**

Initiated by: Larry Sherman **Company:** WCH **Date:** 4/26/12 **Ph #:** 572-6133

Issue/Concern/Affected Step(s):
Definition of Intrusive Activity

Discussion:
With development of the new procedures, and consistent references made to intrusive activities, the definition of “Intrusive Activity” needs to be well defined.

Recommended Resolution:
Incorporate the following into the Definitions section of the next revision of DOE-0342, *Hanford Site Chronic Beryllium Disease Prevention program (CBDPP)*. This Definition however is applicable upon approval of the Resolution Form.

Redefine Intrusive Activity as:

An intrusive activity consists of any of the following processes:

- Altering or modifying an area, room, work area, and/or building structure including the complete or partial removal of items/equipment/systems where an inaccessible area or surface is being exposed. Activities include but not limited to cutting, drilling, sanding and grinding
- Breaching/opening an item/equipment/system for the purpose of performing hands-on work. Examples include monitoring equipment, instrumentation, tool boxes, ventilation ducting or piping where suspect/confirmed beryllium contamination has been identified. This includes complete or partial dismantlement
- Opening/breaching electrical distribution equipment for repair/maintenance activities when controlled for potential or confirmed internal beryllium contamination. Activities include removal/replacement of units/components, air gapping, hands-on troubleshooting and cleaning. The act of conducting visual inspections and/or safe to work/condition checks is not considered to be an intrusive activity.
- Opening/breaching machinery such as panels or components not normally accessed for operation, and/or motors/engines considered to be potentially or internally contaminated. If there is the potential for contamination within one of these systems, such as air intake, hands-on work performed on outside of the components/systems or the closed system, is not considered to be intrusive.

Intrusive activities in beryllium areas and labeled equipment or systems normally require the controls of a Beryllium Work Permit. A BWP is not required, however, when sampling results supports not requiring beryllium qualified workers.

