

**Resolution Form**  
**DOE-0342 Chronic Beryllium Disease Prevention Program**

**ID Number:** 0342-18 Rev. 2

**Title/Subject:** *Revised* - Definition of Job Specific BWP/BHA

**Initiated by:** Scott Seydel **Company:** Be CAP/CHPRC **Date:** 8/27/12 **Phone #:** 373-4860

**Affected Document Number / Revision:**

DOE-0342-001, Rev. 0

**Issue / Concern / Affected Step(s):**

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

**Discussion:**

The purpose of requiring a job specific BWP/BHA is to ensure that employees are adequately protected and that all elements of the activity listed on the BWP/BHA have a common beryllium hazard.

Depending on the nature of the beryllium work activity, a job can have a very narrow scope (e.g. replace light bulbs) or fairly broad (e.g. size reduction and removal of glove boxes and associated activities). For broader jobs, the key consideration is whether there is a similar beryllium hazard for the activities that make up the job and the elements of the work are sufficiently related to be considered a single activity.

**Resolution:**

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

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 1:** *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 2:** *Separate rooms or areas are considered to have a common hazard basis if they have similar:*

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

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While PPE doesn't define a work activity, the same beryllium controls (PPE and respiratory protection) shall be identified on the BWP/BHA.

**NOTE 3:** *This does not apply to specific PPE implemented due to RadCon or Electrical Safety requirements.*

If a work activity has sub-elements, both the higher level job description (e.g. size reduction and removal of glove boxes and associated activities) and the associated sub-elements shall be listed (e.g. electrical work, including opening systems, cutting or terminating electrical wiring or conduit. Servicing, removing and air gapping electrical components). All sub-elements must directly relate to the higher level job description.

Routine surveillance-type activities shall not be included on the same BWP/BHA as non-routine activities unless it is a specific job step in the work package for the non-routine activity.

**Resolution Type:**

Clarification:  Document Change:

**Resolution Completion Plan / Summary:**

These interpretations shall take effect upon approval. The resolution form supersedes Resolution Form 18, dated 7/26/2012.

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.

**Web Site Posting Instructions:**

Post as an active interpretation upon approval of the resolution form.

**Removal from Web Site Instructions:**

Move to the Archived resolution folder upon implementation of DOE-0342-001, Revision 1.

**Configuration Control:**

Major:  Minor:  Initials: Committee Chair: SAS

Significant:  Not Significant:  Initials: DOE RL: PG DOE-ORP [Signature]

**Signatures:**

Accepted	Committee Chair	<u>[Signature]</u>	Date	<u>9/13/12</u>
<u>Concurrence</u> /Approved	DOE-RL	<u>[Signature]</u>	Date	_____
<u>Concurrence</u> /Approved	DOE-ORP	<u>[Signature]</u>	Date	<u>17 Sep 12</u>