

Resolution Form
DOE-0342 Chronic Beryllium Disease Prevention Program

ID Number: 0342-63 **Title/Subject:** Section 6.20, Personal Protective Equipment Edit

Initiated by: Larry Sherman **Company:** HAMTC/WCH **Date:** 02-14-13 **Phone #:** 572-6133

Affected Document Number / Revision:
DOE-0342, Rev 1

Issue / Concern / Affected Step(s):
Inconsistent statement in Section 6.20, Personal Protective Equipment

Discussion:
Section 6.20 of the CBDPP contains a statement on the documentation of donning and doffing of PPE which contradicts the BWP procedure (Rev 1). This statement indicates any special guidance for the donning and doffing of PPE will be documented on the BWP and needs removed from section 6.20 to be consistent with the requirements of the procedure.

Resolution:
Remove the following statement and language (in yellow highlight) from section 6.20, Personal Protective Equipment:

Current Language

10 CFR 850.29 requires the use of protective clothing where particulate forms of beryllium may contact worker's skin, enter openings in workers' skin or contact workers' eyes, including where airborne levels of beryllium meet or exceed the Action Level or where surface levels exceed 3 $\mu\text{g}/100\text{cm}^2$. Any special guidance for donning/doffing of PPE for operations in beryllium-regulated or controlled areas will be documented in the BWP. The Project IH selects the actual PPE to be used and specifies that PPE in the applicable BWP and/or posts PPE directions at the worksite. Government furnished modesty clothing and/or coveralls shall be worn under full body anti-contamination clothing in BRAs (this clothing shall not be taken home). If the disposable outer garment maintains its integrity, the undergarments will be considered to have no contamination. If the outer garment rips, tears, or is otherwise in question, the garments will be thrown away as beryllium waste or held pending IH sample results. Any beryllium worker however can request protective clothing for work in a BCA if the use of the PPE does not produce additional safety hazards.

Proposed Language

10 CFR 850.29 requires the use of protective clothing where particulate forms of beryllium may contact worker's skin, enter openings in workers' skin or contact workers' eyes, including where airborne levels of beryllium meet or exceed the Action Level or where surface levels exceed 3 $\mu\text{g}/100\text{cm}^2$. The Project IH selects the actual PPE to be used and specifies that PPE in the applicable BWP. Government furnished modesty clothing and/or coveralls shall be worn under full body anti-contamination clothing in BRAs (this clothing shall not be taken home). If the disposable outer garment maintains its integrity, the undergarments will be considered to have no contamination. If the outer garment rips, tears, or is otherwise in question, the garments will be thrown away as beryllium waste or held pending IH sample results. Any beryllium worker however can request protective clothing for work in a BCA if the use of the PPE does not produce additional safety hazards.

Resolution Type:

Clarification: Document Change:

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Resolution Completion Plan / Summary:

The changes in this resolution become effective upon approval of this resolution form. These changes will be incorporated into DOE-0342 rev. 2.

Web Site Posting Instructions:

Upon approval post in: *Approved in effect and proposed for incorporation into DOE-0342, Rev. 2*

Removal from Web Site Instructions:

Upon implementation of DOE-0342, Rev. 2 post in: *Historical Archive*

Configuration Control:

Major: Minor: Initials: Committee Chair: SAS

Significant: Not Significant: Initials: DOE RL: PG DOE-ORP MRM *20 FEB 13*

Signatures:

Accepted	Committee Chair	<u>Scott Sepled</u>	Date	<u>2/14/13</u>
<u>Concurrence/Approved</u>	DOE-RL	<u>Pete J. Garcia Jr.</u>	Date	<u>2/20/2013</u>
<u>Concurrence/Approved</u>	DOE-ORP	<u>✓</u>	Date	<u>20 FEB 13</u>