

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: Who May Conduct BWP Reviews During Pre-Jobs**

Initiated by: Scott Seydel, CIH **Company:** CHPRC **Date:** 5/17/2012 **Ph #:** 373-4860

Issue/Concern/Affected Step(s):

While the product team that developed DOE-0342-001, *Hanford Site Wide Beryllium Work Permit (BWP) and Hazard Assessment Procedure*, had a clear understanding of their expectations regarding who may conduct the BWP review during pre-jobs, questions have been raised during training regarding the requirements.

Discussion:

Section 4.3.1 of DOE-0342-001 states that:

The BWP shall be reviewed in the pre-job/evolution briefings in its entirety to reinforce the information necessary to conduct work safely and minimize employee exposure and spread of beryllium contamination.

In the Hanford Site Beryllium Work Permit Instructions in Section 4.3.1 it states:

For the purpose of this Procedure, the term IH refers to a member of the Industrial Hygiene Department qualified to perform the activity identified, unless otherwise specified.

It was the intent of the BWP product team that developed the procedure that IH/IHT's would conduct the vast majority of the BWP reviews during pre-jobs. The presence of the IH/IHT allows technical questions regarding the BWP and/or hazard assessment to be answered in a timely manner. It was acknowledged, however, that in some companies (especially sub-contractors) IH/IHT's are not always available and that other individuals could be qualified. This is especially true in the case of safety professionals who through education and training meet the qualifications of a project IH.

It was also the expectation of the BWP product team that the BWP would be reviewed during every pre-job for a given work evolution. There were two main reasons for this requirement. First, the employees involved in the work evolution may change due to the use of loaned labor, employee illnesses, training, and PTB. Second, conditions may change over the course of the work evolution raising questions about how the BWP requirements are to be implemented.

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: Who May Conduct BWP Reviews During Pre-Jobs**

Recommended Resolution:

The following interpretations shall apply in the implementation of the requirements of DOE-0342-001:

1. The terms “Industrial Hygiene Department” and “Occupational Safety & Health Department” are considered to be interchangeable in the procedure.
2. Safety professionals who are deemed qualified (through education and/or experience) by their company to perform the work of project IH’s shall be considered IH’s for the purposes of this procedure.
3. IH/IHT’s shall conduct the initial review of the BWP for a work team. Once the initial review has been conducted with the work team, IH/IHT’s shall conduct subsequent reviews whenever they are available.
4. If an IH/IHT isn’t available, the briefing may be conducted by another individual from the contractor’s Occupational Safety & Health staff or by the Field Work Supervisor/First Line Manager conducting the pre-job so long as they have reviewed the BWP and hazard assessment with an IH/IHT and have met the following qualifications:
 - a. Non-IH/IHT Occupational Safety & Health staff member
 - i. Current Beryllium Worker training (course 004100)
 - ii. Either Beryllium Training for Planners/PICs/Supervisors/Managers (course 004107) or Beryllium Work Permit Preparation (course 004113)
 - b. Field Work Supervisor/First Line Manager
 - i. Current Beryllium Worker training (course 004100)
 - ii. Beryllium Training for Planners/PICs/Supervisors/Managers (course 004107)

NOTE: The review of the BWP and hazard assessment with an IH/IHT may occur when the IH/IHT does the initial review with the work team.

5. If during the BWP review a question is raised that requires an IH/IHT to answer, no entry into the BCA/BRA may occur until an IH/IHT has been contacted and an adequate answer provided.

Existing:
See above.

Clarification **Guidance**

Resolution Completion Plan/Summary:

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 the CBDPP Committee shall determine whether some or all of these interpretations should be incorporated into the procedure.

**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:** **Who May Conduct BWP Reviews During Pre-Jobs**

Remarks:

Status:

Reviewed	Committee Chair	<u>Scott Seydel</u>	Date	<u>5/17/12</u>
Rejected	Committee Chair	<u>N/A</u>	Date	_____
Accepted	Committee Chair	<u>Scott Seydel</u>	Date	<u>5/17/12</u>
<u>Concurrence/</u>				
Approved	DOE-RL	<u>Pet. J. Garcia Jr.</u>	Date	<u>5/17/2012</u>
<u>-Concurrence/</u>				
Approved	DOE-ORP	<u>[Signature]</u>	Date	<u>17 MAY 12</u>
Approved For Use	Committee Chair	_____	Date	_____
DOE-0342				
Updated	Committee Chair	_____	Date	_____