Appendix B

Document Control and Records Management Procedures

B1.0 Document Control and Records Management Procedures

Administrative procedures have been developed to define responsibilities, establish documentation and change control requirements, and employ standard work processes in implementing the monitoring, inspection and review requirements established in the *Long-Term Surveillance and Maintenance Plan for the Monticello NPL Sites* (LTS&M Plan). Included within this appendix are (1) the document control procedures that will be used in managing the LTS&M Plan, (2) the records management procedures that will be used in developing, protecting, and storing project records, and (3) requirements for documenting work activities and inspections established for the work performed through implementation of the LTS&M Plan for the Monticello National Priorities List (NPL) Sites.

B1.1 Document Management Process

This procedure describes the requirements and processes that will be used in managing and maintaining the Monticello LTS&M Plan current for project use. It will ensure that the changes are appropriately documented, reviewed by the affected organizations, and approved by the responsible levels of management. The flow chart shown in Figure B−1 shows the responsibilities and document production and distribution process that will be used.

B1.1.1 Scope

This procedure shall be used to initiate and authorize changes to the Monticello LTS&M Plan resulting from

- The U.S. Department of Energy (DOE) task order modification that authorize changes to project scope,
- Significant or unanticipated changes to site conditions, or
- Regulatory direction that affects the activities, monitoring, or inspection requirements established in the Plan.

B1.1.2 Responsibilities and Procedures for LTS&M Plan Review and Change Control

Because the LTS&M Plan is a Federal Facilities Agreement (FFA) listed primary document, no changes to the document will be initiated or made without DOE authorization and U.S. Environmental Protection Agency (EPA), and Utah Department of Environmental Quality (UDEQ) review and concurrence. DOE, EPA, UDEQ, or contractor staff may request changes to the LTS&M Plan. Contractor initiated change requests will be made to the Site Manager, who will evaluate the request and bring the matter to the attention of the Task Order Manager and DOE Office of Legacy Management (DOE-LM) Monticello Project Manager when appropriate. The DOE-LM Monticello Project Manager will evaluate proposed changes, and if warranted, will confer with EPA and UDEQ to jointly discuss the proposed changes and the resulting effects to the project. When a change is authorized, DOE will direct the Site Manager to initiate the change control process (reference Figure B−1).

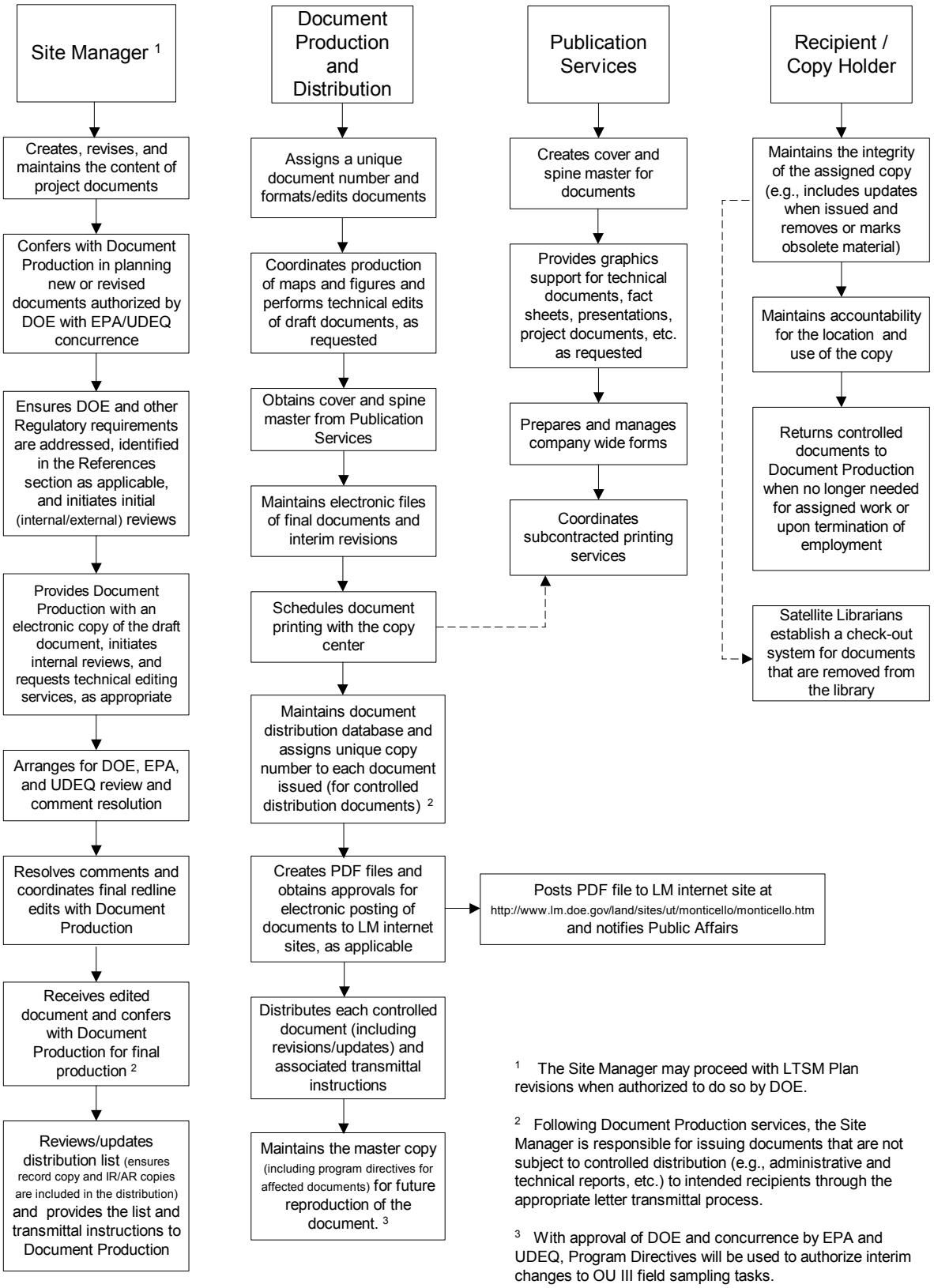

Figure B−1. Responsibilities and Document Development and Distribution Process

The LTS&M Plan will be reviewed annually (concurrent with the Annual Inspection) and revised, as needed to ensure that DOE is conducting LTS&M at an appropriate level of effort.

Upon being directed to initiate a new procedure or make a revision to an existing procedure or process, the Site Manager will consult with the contractor's document production staff and adhere to the guidelines for preparing, reviewing, revising, and distributing documents as shown in Figure B−1.

When authorized by DOE, and with EPA and UDEQ concurrence, the Site Manager will

- Prepare a draft of the new or revised material for internal review.
- Determine who will review the preliminary draft changes and distribute the material to the designated internal reviewers.
- Resolve internal review comments and prepare and distribute a draft (including request for written comments) for external review by DOE, the regulators (EPA and UDEQ), and others technical experts, as requested.
- Resolve external review comments.
- Send a draft final copy to DOE and the regulators for final review and concurrence.
- Ensure that external comments have been satisfactorily addressed then prepare the new or revised material for final production.
- Initiate final production and controlled distribution through the contractor's designated document production and distribution staff.
- File the DOE and regulatory (EPA and UDEQ) review records in accordance with the Monticello Site File Plan (shown by example in Attachment B–1) for records.

Project documents, including changes and reviews, will be maintained in accordance with the records requirements (Section B1.2) and the Monticello Site File Plan (shown by example in Attachment B–1).

Designated Reviewers will

- Review the change for completeness and technical accuracy.
- Ensure that the change will enhance or improve the procedure.
- Document comments to the author through approved methods (e.g., standard review forms, redline/strikeout mark-up of electronic files or paper copy of the document, e-mail correspondence that clearly identifies the reviewer and specific comments) that include the name of the reviewer, the date of the review, review comments, and whether the comments are for the authors consideration or must be resolved.

Changes will typically include reissuing the

- Table of Contents (identifying the change through side-bars or dates); and
- Entire section (identifying the change through side-bars or dates). **Note:** individual page changes are <u>not</u> allowed.

Markings such as change bars or text highlighting of some sort may be used to identify the revised material. When a new procedure, process, or a major revision to a current procedure is prepared markings of this nature are not needed, and the change will be noted by the revision date on the footer and the identifier used in the contents. A Summary of Changes page will be included with the controlled document transmittal package when substantial changes or new procedures or processes are introduced.

After all internal and external review comments have been addressed, the changes will be issued to the document holders (including Master Copy, Record Copy, and Information Repository [IR] copy holders) identified on the controlled document distribution list shown in Table B−1. Additional instructions provided with the Document Transmittal form will include appropriate insertion and deletion information and indicate whether the material is new or revised.

Table B−1. Distribution List

Copy Recipient	LTS&M Plan
DOE-LM Monticello Project Manager	2 copies
EPA	3 copies
UDEQ	2 copies
Monticello City Manager	1 copy
UDOT Monticello Station Supervisor	1 copy
Task Order Manager	1 copy
Site Manager	1 copy
Monticello LM Representative(s)	1 copy
Contractor Environmental Specialist	1 copy
Monticello AR/IR Coordinator	2 copies
LM Monticello Records Coordinator	Record Copy
Contractor Document Production staff	Master Copy

B1.1.3 Program Directives

Program Directives will be used to document and authorize interim changes to Operable Unit (OU) III field sampling and monitoring tasks. Program Directives will be initiated by the Site Manger, at the direction of DOE. Procedures, formats, and guidelines for preparing, reviewing, approving, controlling, and issuing program directives are maintained by the contractor in accordance with DOE approved quality assurance instructions. The guidelines and an example directive are shown in Attachment B–2. Program Directives will be reviewed by affected organizations and authorized by DOE with concurrence from EPA and UDEQ. Program Directives will be distributed to recipients of the current DOE-LM sampling and analysis plan (DOE 2006c) when finalized through the approval signature of the Environmental Monitoring/Field Services Manager. The Site Manager will summarize changes that have been authorized through program directives, in routine FFA reports.

B1.2 Records Management

The records management system identifies responsibilities and provides location, storage, access, disposition, and record retrieval capabilities through data base management and the use of bar-code technology for all Monticello LM records. All records created in support of LTS&M of the

Monticello NPL sites shall be managed in accordance with DOE-LM requirements and policy for record and nonrecord (i.e., working copies) material. This guidance includes, but is not limited to, meeting the requirements of Title 44 *United States Code* Chapter 33, "Disposal of Records;" 10 CFR 835, Subpart H, "Records;" 36 CFR 1228, "Disposition of Federal Records," Subpart B, "Scheduling Records;" DOE Order 1324.5B, *Records Management Program*; and the DOE *Office of Legacy Management Quality Assurance Project Plan for CERCLA Sites* (DOE 2006a).

B1.2.1 Administrative Record, Information Repository, and LM Records Collections

There are two active collections of documents associated with Monticello LTS&M activities: (1) the IR and (2) the LM Records Collection. A third collection, the Administrative Record (AR), is inactive and has been completed with the signing of each of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site Records of Decision. Additions to the AR collection will be made when material is identified that should have been included as the collection was developed.

The Monticello AR and IR records collections are available to the public at the Monticello Field Office and in the Technical Library at the DOE-LM office in Grand Junction, Colorado. The current versions of the subject indexes for both of the ARs and IR are available to the public through the DOE-LM Internet webpage at the following internet address: http://www.lm.doe.gov/land/sites/ut/monticello/monticello.htm

Administrative Record—For the Monticello CERCLA sites, two AR collections were established to provide public information relevant to the site background and technical basis for the selected remedy. The first is a consolidated collection that included information relevant to the Monticello Mill Tailings Site (MMTS) (OUs I and II) and Monticello Vicinity Properties (MVP) Project. A second AR was established to address the Monticello Surface Water and Ground Water Project administered as OU III of the MMTS. The retention period for each AR collection at the site is typically a minimum of 10 years, after which the material is transferred to the Federal Records Center for long-term storage in accordance with the 75-year retention schedule. The MMTS/MVP AR is planned for federal records disposition during calendar year 2008, and the MMTS OU III collection during year 2014. The MMTS OU III AR collection cross-references to some documents in the MMTS/MVP AR collection. The cross-referenced documents will be retained with the OU III AR when the MMTS/MVP records are transferred to the Federal Records Center in 2008.

Information Repository—The IR is a working set of documents that contain the information pertaining to the response action as required under CERCLA. The Site Manager is responsible for determining the project documents that will be included in the IR. The IR collection of documents is updated semiannually (typically in October and April). DOE, EPA, and UDEQ will be informed of the October update including a list of the changes that were made. Following the April update a printed copy of the index and list of changes will be sent to DOE, EPA, and UDEQ. This will enable DOE and the regulators to have a current version of the index should they need to use it in planning for the Annual Inspection. Annual reports, copies of the completed record books, and supporting documentation in the IR will

- Document the history of the remedy performance,

- Provide documentation necessary to prepare and conduct site surveillance and maintenance activities,
- Provide DOE, EPA, and UDEQ with the information necessary to forecast future surveillance and maintenance needs, and
- Provide information to the public to demonstrate that remedy integrity has been maintained.

LM Records Collection—The LM Records Collection contains the record copy for the DOE-LM Monticello NPL sites. The retention period and disposition authority for all records created in support of LTS&M activities will be documented in the Monticello Site File Plan, shown in Attachment B–1. This collection is managed and stored in accordance with DOE-approved records management policy and procedures.

A comprehensive data-based records management system is deployed through the computer network maintained at the DOE-LM office in Grand Junction. The database is accessible to all DOE and contractor staff. The LM records collections for Monticello projects (MMTS and MVP) are currently stored at the DOE-LM office in Grand Junction. Management, retrieval, and storage of the collections is overseen by the LM Records Coordinator. Records within the Monticello LM collection are filed in accordance with the guidance and structure provided in the Monticello Site File Plan (Attachment B–1).

The Monticello Site File Plan is an electronic index that identifies record categories and associated file code numbers, the storage location of the record, the designated custodian for the record and the established retention schedule for the record. The index can be printed when needed for reference purposes or to identify the file code that applies to a type of record when it is generated. Revisions to the Site File Plan are generally initiated by the Site Manager and are administered and controlled by the LM Records Lead.

B1.2.2 Record Keeping

Record-keeping requirements are common to all aspects of the Monticello LM activities. Table B−2 is a summary that identifies the general records that are created through the requirements established in the various sections of the LTS&M Plan.

Table B−2. Cross Reference to Records by Section Numbers

Section Reference	Subsection Reference and Record Generated
Section 2.0 "LTS&M Administrative Policies and Procedures"	2.4 Records Management and Document Control Process • Administrative Record and Information Repository records collections 2.5 Health and Safety • Job Safety Analysis, Safe Work Permits, or Radiological Work Permits 2.6 Training • LTS&M Briefing—training roster 2.7 Quality Assurance • Monticello section to the LM QAPP for CERCLA Sites
Section 3.0 "LTS&M Procedures for DOE-Owned Property"	3.2 Routine Surveillance of the Monticello Repository • Repository Area surveillance checklist • Storm event surveillance checklist • Photographs of inspection features • Meteorological monitoring reports • Pond 4 surveillance checklist • Repository Site Record Book 3.3 Disposal Cell and Pond 4 LCRS and LDS Operations • Telemetry Data book—Water management reports • Sample documentation (chain of custody, analytical reports), as applicable 3.4 Temporary Storage Facility Operation and Maintenance • Temporary Storage Facility record book (including Entry Logs, Inspection Reports, Materials Transfer Logs and Radiological Survey Maps (GJO 1553e)

Table B−2 (continued). Cross Reference to Records by Section Numbers

Section Reference	Subsection Reference and Record Generated
Section 4.0 "LTS&M Procedures for Non-DOE-Owned Property"	4.2 Routine Surveillance Procedures • Entries in the appropriate record book (i.e., City-owned Properties, Public Roads and Utilities, and Private Property Restricted Areas) • Photographs of special features • Updates to As-built drawings • Correspondence (phone record/e-mail, etc.) concerning affected properties and property owner contacts 4.3 Requirements for Non-Routine Conditions 4.3.1 Storm Events • Entries in the appropriate record book (i.e., City-owned Properties, Public Roads and Utilities, and Private Property Restricted Areas) • Photographs of special features • Radiological survey data • Updates to As-built drawings 4.3.2 Special Radiological Control Procedures • Entries in the appropriate record book (i.e., City-owned Properties, Public Roads and Utilities, and Private Property Restricted Areas) • Radiological Access and Frisking Log (GJO 1551e) • Radiological survey map (GJO 1553e) • Personnel and Skin Contamination report (GJO 1785e) • Incident/Safety Report (GJO 1743e) 4.3.3 Suspected Mixed Waste • Entries in the appropriate record book (i.e., City-owned Properties, Public Roads and Utilities, and Private Property Restricted Areas) • Field recognition criteria monitoring and radiological scan results • Photographs of visual field recognition criteria • Sampling plan and related sample documents (field data, summary trip report, chain of custody, analytical reports) • Correspondence (phone records/e-mail, letters, and memoranda) concerning affected property, owner contacts, DOE or other regulatory decisions and directions.

Table B−2 (continued). Cross Reference to Records by Section Numbers

Section Reference	Subsection Reference and Record Generated
Section 5.0 "LTS&M Procedures for Operable Unit III, Surface Water and Ground Water"	5.3 Water Quality and Hydrologic Monitoring Scope • Program Directives • Field monitoring and sampling (field data, summary trip report, chain of custody, analytical reports) 5.4 Evaluating and Reporting Remedy Performance • Annual Data Summary Report 5.5 Biomonitoring • Program Directives • Field monitoring and sampling data and reports (field data, summary trip report, chain of custody, analytical reports 5.6 Management Strategy for the Permeable Reactive Barrier and Treatment Cell • Sample results and decommissioning plan 5.7 Well Abandonment • Well abandonment records
Section 6.0 "LTS&M Procedures for Annual Inspections and CERCLA 5-Year Reviews"	6.1 Annual Inspections • Inspection planning information and completed inspection checklists • Annual Inspection Report 6.2 CERCLA 5-Year Review • Settlement Plate survey data • Community contact information • Interview reports, checklists, surveys, etc. • Inspection results • CERCLA 5-Year Review Report
Appendix F "Radiological Survey Procedure" and **Appendix G** "Uranium Scan Procedure for Property MP−00211"	• Radiological survey maps (GJO 1553e) • Alpha and Beta-Gamma Survey Data Sheet • Instrument response check forms (GJ 1974Ae and GJ1975e)
Appendix H "Procedures for Transportation of Radioactive Materials"	• Shipping papers • RAM transport evaluation forms • Incident/Safety report form (GJO 1743e)

Records will be maintained in accordance with the latest revision of the LM Working File Index.

B1.2.2.1 Assigning File Codes to Records

The Monticello LM Representative and all other personnel generating LM records shall

- Ensure that the applicable LM site file code is placed on *all* records created as a result of the LM activities.
- Use the most current revision of the Monticello Site File Plan as the source for assigning site file codes. (**Note:** The current revision of the Monticello Site File Plan is maintained in the "Hummingbird" computer program on the DOE-LM Novell-delivered Applications computer network.
- Place the Monticello site file code on the distribution list for the record ***or*** write the Monticello site file code in the lower right-hand corner of the record.

If the Monticello Site File Plan does not address a record created by these procedures, or ***if*** additional environmental protection or control is needed for a record type, ***then*** contact the Site Manager for resolution of the issue. The Site Manager will coordinate changes with the LM Records Lead.

B1.2.2.2 Transferring Records to the LM Records Collection

Most record material is transferred to the LM records collection at the time of distribution. The records are received by the LM Records Coordinator, or designee, who bar-codes and enters key data in the DOE database records system for future records search or retrieval. Following bar-coding and database entry the record is filed in the Monticello LM Records Collection.

Note: All records associated with radiologically contaminated materials having Ra-226 concentrations of 130 picocuries per gram or greater shall first be submitted to the Radiological Control Manager for supervisory review and sign-off before being sent to the assigned LM Records Coordinator.

B1.2.3 Drawings

MMTS and MVP completion reports (available in the IR in file numbers IR440, IR624, IR687 and IR688) include drawings of assessed and removed contamination and may include contamination data in adjoining city streets or utility rights-of-way.

An indexed set of radiological as-built drawings resides in the Monticello Field Office. The index lists engineering drawings of all supplemental standards properties at Monticello. The index is used by the Monticello LM Representative to identify the appropriate drawing for locating contamination left in place, utility lines, erosion activity, and documenting excavations for each of the properties. Additionally, the drawing index lists the scale of each drawing and the most recent date that each drawing was electronically updated. (**Note:** Repository and Pond 4 as-built construction specifications and drawings are included in the Information Repository as file numbers IR729 and IR730).

The Monticello LM Representative is responsible for keeping the radiological as-built drawings up to date with pertinent information required by operating procedures in Sections 3.0 and 4.0 and in associated Appendixes F and G. Changes to the drawings will be annotated in permanent

red ink by the Monticello LM Representative each time new information with regard to radioactive contamination becomes available. The drawings shall be stored in the Monticello Field Office records vault. The annotated drawings will be forwarded annually, by the Monticello LM Representative to the Contractor Site Manager to be electronically updated. Updates are generally made during the first part of the calendar year when city construction activities are minimal. Copies of the revised index and drawings will be returned to the Monticello LM Representative and the record copy will be sent to the assigned LTS&M Records Coordinator for storage in the Monticello LM Records Collection.

B1.2.4 Record Books

Documentation is necessary to record LTS&M activities for the Monticello NPL sites. The activities will be recorded in the record books and on drawings that have been established for this purpose. The following section describes the process for ensuring complete and accurate histories of these activities so that evidence of compliance with the LTS&M Plan is adequately documented.

The Site Manager shall

- Establish a Site Manager's record book to document
  - —Identify the record books that are issued, location of the record books, the unique identifier (beginning with Book #1) for each record book, and the period of time (e.g., beginning and end date) covered by the book.
  - —Update the Site Manager's record book with information and completion or termination dates for record books that have been completed, lost or destroyed, or terminated through completed work or revised procedures.
  - —Other LTS&M information may be addressed by the Site Manager in the record book as deemed appropriate.
- Assign the following individual record books to the Monticello LM Representative:
  - —Repository Site record book (includes the Disposal Cell, Pond 4, and all property within the repository boundary fence)
  - —Temporary Storage Facility record book
  - —City-owned Properties record book (includes properties transferred to the City through the Covenant Deferral and MP−00211−VL)
  - —Public Roads and Utilities record book (includes City streets, utility corridors, and Highway 191 and 491 rights-of-way)
  - —Private Property Restricted Areas record book (includes restrictive easement [i.e., OU II soil and sediment] properties, supplemental standards property MS–00176–VL, and properties included in the ground water restricted area, as designated by the State Engineer)
- Review quarterly copies of record book entries and give them to the AR/IR Coordinator for maintenance until the record book has been completed.

The Monticello LM Representative, shall

- Review the procedures in the LTS&M Plan for the Monticello NPL Sites, including the appendixes to determine the information to be recorded in each of the record books.
- Upon receiving the record book the Monticello LM Representative ensure the following information is recorded on the cover and will make any necessary corrections:

  —Title of record book (property identification as listed above).

  —Starting date of the record book using four characters to designate the year (mm/dd/yyyy).

  —Identification of the Monticello LM Representative, including address and phone number.
- Initiate or ensure that a Signature/Initial Log has been established on the first page of the record book. The log will provide for the printed name, signature, and initials used by the Monticello LM Representative, backup personnel, and reviewers who are authorized to make entries in the record book.

  —Annotate the entry as "discontinued" when an individual is no longer authorized (e.g., change in job or employment). The correction will be initialed and dated. ***Note:*** a two-character year designation (e.g., 2/14/06 for February 14, 2006) is adequate, since the book cover will identify the years covered using a four-character entry.

  —Create a back-up copy of the record book by photocopying each day's entry. The duplicate copies will be stored temporarily on site in the records vault before being sent on a ***quarterly*** basis to the Site Manager for review and retention until the book is complete.
- When a record book is complete the completion date will be recorded on the cover, using a four character entry for the year (e.g., 2009). The final entry will identify the title and book number where follow-on information will be recorded.

  —Review the record book for completeness, make any needed corrections, initial and date all entries and send the completed record book to the Site Manager.

The Monticello AR/IR Coordinator shall

- Store the back-up copies of record book entries, received quarterly, following their review by the Site Manager. Back-up (i.e., duplicate) copies will be retained in a three-ringed binder labeled and numbered similar to the original record book.
- Ensure that completed record books are photocopied in duplicate for inclusion in the IR and that the original record book is transferred to the assigned LM Records Coordinator. Upon inclusion in the IR, the working collection of duplicate copies may be discarded. If retained, they will be identified as reference material.

B1.2.4.1 Recording Field Data

When making entries in the record books, the Monticello LM Representative or other authorized individuals shall:

- Write legibly with permanent ink so that the entry is reproducible.
- Clearly describe the purpose (e.g., semiannual ground water restricted area inspection, monthly Pond 4 surveillance) and observations that are made so that other equally experienced personnel can understand what was observed.
- Keep the record book pages intact (i.e., do not remove pages from the book).
- For the first entry in a record book, give reference to the previous record book title and book number.
- Sign and date each entry if a page has entries for more than one day. **Note**: initials are acceptable for signing an entry, as long as the individual making the entry is authorized and has signed the Signature/Initials Log in the front of the record book. The format of the date will identify the month, day, and year (e.g., 2/14/06).
- Rule across the blank area and sign and date the rule line if a page or part of a page must be left blank.
- Cross reference the pages or records of related information so that they are known to belong together; if entries for a specific activity are made on two or more pages (e.g., "continued"), if entries are included in separate records (e.g., initial information recorded during the previous month, see page #).
- Cross reference to drawing page numbers for radiological survey data entries.
- Make a copy of each completed entry and send it on a ***quarterly*** basis to the Site Manager for review and maintenance as a duplicate (back-up) of the record book in a similarly labeled and numbered three-ring binder.
- For the last entry in a record book, state that the activities are complete, or give a reference to the next sequential record book. Add the completion date (using the four-character year) to the cover of the record book.
- Transfer completed record books to the Site Manager or his designee for final review and records management responsibilities.

B1.2.4.2 Correcting Errors

If an error is made in a record book entry, the Monticello LM Representative, or other persons authorized to make an entry, shall:

- Draw a line through the error.
- Enter the correct data.
- Initial and date the correction.
- State in the record book the reason for the correction, as appropriate.

Note: Material such as opaquing fluid or correcting tape that obscures the original entry is prohibited.

B1.2.4.3 Storage of Record Books at the Monticello Field Office

The Monticello LM Representative shall

- Protect record books from loss or damage.
- Protect record books from light, moisture, heat, and pests.
- Retain photocopies of record book entries in a three-ringed binder marked "copy" and labeled with the name of the record book(s).

B1.2.4.4 Review of Record Books

Each of the LM record books is reviewed by an independent reviewer during the annual inspection.

The independent reviewer shall

- Evaluate the record book for accuracy, content, error correction, legibility, and reproducibility.
- Ensure that record book notations and observations conform to the requirements of the procedures in this manual.
- ***If*** an error in an entry is found, ***then***

  —Verify the correction with the Monticello LM Representative.

  —Draw a line through the error.

  —Make the correct entry.

  —Initial and date the correction.

  —State in the record book the reason for the correction.

  —State that the correction was verified by the Monticello LM Representative.
- ***If*** a written comment needs to be made in a record book, ***then***

  —Clearly identify the comment as a review comment.

  —Sign and date the comment.
- ***If*** any of the pages are changed during the review, ***then*** make a copy of the pages and send the copy to the AR/IR Coordinator for the duplicate record book.
- When satisfied that the data entered are complete and correct, sign and date the record book, making note of the pages and supporting documentation that were reviewed.

B1.2.4.5 Managing Record Books

Requirements to maintain backup copies of each record book have been established to reduce the risk and minimize the impact if a record book is lost or destroyed. If a record book is lost or destroyed, the backup duplicate copy retained by the AR/IR Coordinator will be used as the record copy and basis for duplicating material for inclusion in the IR. The end date for the lost or

destroyed book and the reason the incomplete book was ended will be noted in the Site Manager's record book. A new record book will be started.

If a record book is terminated because the work is complete or procedures have changed such that the information will be recorded in a consolidated record book ***then*** the record book will be closed out as if it had been completed.

B1.2.4.6 Transfer and Closure of Completed Record Books

When a record book is completed the LM Representative will submit it to the Site Manager, who will update the record book log, in the Site Managers Logbook, and perform a final review of the contents of the record book for completeness and accuracy. Upon completion of the review the Site Manager will make a final entry in the record book indicating it has been reviewed and is accepted as complete and will then sign and date the final entry. The Site Manager will then coordinate long-term storage of completed record books through the AR/IR Coordinator and the assigned LM Records Coordinator as follows:

- Following the final review of a completed record book, two copies will be made for inclusion in the Monticello and Grand Junction IR record collections.
- The duplicate copies previously retained by the AR/IR Coordinator will be discarded after the IR has been updated.
- The original record book will be forwarded to the assigned LM Records Coordinator for bar coding and storage in the Monticello LM Records Collection.

B1.2.5 Photographic Records

Photographs are used as a means to document that a thorough and efficient inspection of each property is performed. The Monticello LM Representative shall

- Take photographs with a digital camera or 35-millimeter (mm) film that is ***not*** self-developing.
- When a photograph is taken, record the following information in the record book:

  —Property and location

  —Date; time of day

  —File number or film roll number and frame number (if film camera is used)

  —Subject and description

  —Weather conditions, if applicable

  —Direction photograph taken. Use the following abbreviations, if needed:

N	north	W	west
NNE	north northeast	WNW	west northwest
NE	northeast	WSW	west southwest
ENE	east northeast	NW	northwest
E	east	NNW	north northwest
ESE	east southeast	SM	survey monument

SE	southeast	SMK	Site marker
SSE	south southeast	mi.	mile
S	south	in.	inches
SSW	South southwest	ft	foot
SW	southwest		

- Upon receipt of the developed prints or printing digital photographs, identify each print on a label as follows: Site name (or abbreviation); date (e.g., 2/03/07); description.
- Place photographic prints in the photographic file located in the Monticello Field Office.

B1.2.5.1 Negatives

The Monticello LM Representative shall:

- Place the photograph negatives in archival-quality protective sleeves and annotate the sleeve with record book page number, film roll number, and frame number.
- Create an index of the negatives consistent with the annotations that are placed on the prints.
- Place the negatives in the records vault at the Monticello Field Office.
  Note: The negatives will become the long-term record, whereas the prints will be kept for convenience.
- Transfer the negatives to the LM Records Collection biannually.

B1.2.5.2 Digital Media

Digital files will be sent to the Site Manager. The Site Manager shall copy the files to the LM shared directory for permanent storage.

Digital media in an electronic format (e.g., .jpeg, .tif, .png, .eps) is transferred onto the computer for easy access in the Monticello LM folder, and the pictures are organized by year (i.e., 2006 is a folder name).

Within each folder is a subfolder containing the date and a general description of contents of each photograph. Each photo has a date and time stamp, and the file name has a description of what the photo is. Each month the photos are backed up to a compact disk (CD) for storage, and at the end of each year the digital media is backed up to CD by year and sent to the Records Management organization as a backup.

Attachment B−1

Monticello Site File Plan

SITE FILE PLAN

MNT - Monticello, UT	Location	Responsible Person	Retention	Disposal Authority
* **MNT 000 Administration and Management**				
* **MNT 005 Administrative Plans**				
010 Administrative Record - Information Repository				
010.02(A)-Administrative Record - Information Repository	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.A
015 Agreements - Legal Affairs				
015.10(A)-Leases, MOUs, and Agreements	GJ - Bldg 810/Rm 214	Roxana Burrows	10 YRS	N1-434-95-5.A.1
015.20(A)-Real Estate - V5	Bldg 12/Vault #5	Cindy Smith	10 YRS	N1-434-95-5.A.1
015.20(B)-Real Estate - LTS&M	GJ - Bldg 12/Room 20	Dianna Roberts	10 YRS	N1-434-95-5.A.1
* **MNT 020 Committees - Meetings**				
025 Community Relations				
025.10(A)-Fact Sheets - Information Updates	GJ - Bldg 12/Room 20	Dianna Roberts	PERMANENT	ADM-16.01.05.B
025.25(A)-Press Releases - News Clippings	GJ - Bldg 12/Room 20	Dianna Roberts	PERMANENT	ADM-16.01.05.B
030 General Correspondence				
030.02 Contractor				
030.02(A)-Contractor	GJ - Bldg 12/Room 20	Dianna Roberts	PERMANENT	ADM-16.01.05.B
030.10 DOE				
030.10(A)-DOE	GJ - Bldg 810/Rm 214	Roxana Burrows	PERMANENT	ADM-16.01.05.B
035 Quality Assurance				
035.20(A)-Quality Assurance Plans	GJ - Bldg 12/Room 20	Dianna Roberts	10 YRS	ENV-01.A
045 Reports				
045.10(A)-Quarterly Reports	GJ - Bldg 12/Room 20	Dianna Roberts	Closed+01 YR	GRS-16.05
045.15(A)-Technical Reports	GJ - Bldg 12/Room 20	Dianna Roberts	Closed+01 YR	GRS-16.05
045.15(B)-Technical Reports - V5	Bldg 12/Vault #5	Cindy Smith	Closed+01 YR	GRS-16.05
050 Site Photographic Material and Drawings				
050.02(A)-Aerials - LTS&M	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
050.02(B)-Aerials - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
050.10(B)-As-Built Drawings - V5 Hanging Maps	GJ - Bldg 12/RM 20 - Map File	Cindy Smith	75 YRS	ENV-01.K.3
050.10(C)-As-Built Drawings - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
* **MNT 100 Environmental**				
* **MNT 100.02 Environmental Correspondence**				
* **MNT 102.02 Analytical Reports**				
105.02 Environmental Inspections and Assessments				
105.02(A)-Environmental Inspections and Assessments	GJ - Bldg 12/Room 20	Dianna Roberts	FC+5	ENV-02.A
* **MNT 110.02 Environmental Planning Documents**				
115.02 Environmental Reports				
115.02(A)-Environmental Reports	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.D.8
120.02 NEPA -EA, EIS, ROD, CX, EC, etc-				
120.02(A)-NEPA -EA, EIS, ROD, CX, EC, etc-	GJ - Bldg 12/Room 20	Dianna Roberts	PERMANENT	ENV-02.F
125.02 Permits				
125.02(A)-Permits	GJ - Bldg 12/Room 20	Dianna Roberts	EXP+3	ENV-03.B.5
130.00 Field Sampling and Analysis				
130.02(A)-Field Sampling and Analysis Case Files	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-05.A

SITE FILE PLAN

MNT - Monticello, UT	Location	Responsible Person	Retention	Disposal Authority
130.10(A)-Field Sampling Plans	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-05.A
135.00 Air Monitoring				
135.02(A)-Air Monitoring Event Case File by Event Date	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04
135.02(B)-Analytical Report - Air Monitoring Event Case File -	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-04
135.10(A)-Air Monitoring Plans	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04
*** MNT 200 Waste Management**				
210.02(A)-Annual - Biennial Reports	GJ - Bldg 12/Room 20	Dianna Roberts	05 YRS - Closed	ENV-02.A.2
220.02(A)-Hazardous Waste Manifests and Shipping Documents	GJ - Bldg 12/Room 20	Dianna Roberts	05 YRS - Closed	ENV-02.A.2
*** MNT 300 Health and Safety**				
300.02(A)-Health and Safety Correspondence	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
310.02(A)-Health and Safety Inspections - Log Books	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
315.02(A)-Health and Safety Plans	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
315.03(A)-Health and Safety Reports	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
320.02(B)-Safe Work Permits - JSAs - Other Permits	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
320.05(A)-Site Safety Briefings/Pre-job Briefs/Training - LM	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
325.02(A)-Health and Safety Monitoring Data - Surveys	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ADM-01.21.3.B.1
*** MNT 400 Groundwater**				
420.02(B)-Annual Environmental Monitoring	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04.D
400.02 Groundwater Correspondence				
400.02(A)-Groundwater Correspondence	GJ - Bldg 12/Room 20	Dianna Roberts	10 YRS - Closed	ADM-18.11.1.C
*** MNT 402.02 Compliance Plans**				
405.02 Field Investigation				
405.02(A)-Field Investigation	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04.D
405.02(B)-Field Investigation - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-04.D
410.00 Groundwater Monitoring				
410.02(A)-Groundwater Monitoring Event Case File by Event Date	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04
410.02(B)-Analytical Report - Groundwater Monitoring Event Case	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-04
410.02(C)-Groundwater Monitoring Event Case File by Event Date	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-04
410.02(D)-Groundwater Monitoring Event Case File by Event Date	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04
410.10(A)-Groundwater Monitoring Plans	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-04
415.00 Well Files				
415.02(A)-Well Case Files by Well Number	GJ - Bldg 12/Room 20	Dianna Roberts	PLUG+3	ENV-02.I.1
415.02(B)-Well Case Files by Well Number - V5	Bldg 12/Vault #5	Cindy Smith	PLUG+3	ENV-02.I.1
415.10(A)-Decommissioning Plans	GJ - Bldg 12/Room 20	Dianna Roberts	PLUG+3	ENV-02.I.1
*** MNT 500 LTS&M**				
505 Custody and Long-Term Care Licensing				
505.15(A)-LTS&M Plan Case Files - LTS&M	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.2.A
505.15(B)-LTS&M Plan Case Files - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.2.A
505.20(A)-Transition and Transfer Plans and Supporting	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.2.A
510 Site Assessment, Design, and Closure				
510.10(A)-Remedial Action Plan, Reclamation Plan, Radiological	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
510.15(A)-Site Characterization Reports	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
510.20.05(A)-CERCLA 5-Year Review	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
510.20.05(B)-CERCLA 5-Year Review - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
515 Site Maintenance Case Files				
515.02(B)-Field and Routine Inspection Logs Includes	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3

SITE FILE PLAN

MNT - Monticello, UT	Location	Responsible Person	Retention	Disposal Authority
515.10(B)-Maintenance Report	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
515.15(A)-Maintenance Issues	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
515.15(B)-Maintenance Issues - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
515.20(B)-Work Plan Case Files	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
*** MNT 520 Site Operations and Treatment Systems**				
525 Site Physical Data and Completion Reports				
525.02(A)-Certification Report	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
525.10(A)-Close-Out Audit Report	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
525.15(A)-Site Completiion Report	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
530 Site-Specific Technical Studies				
530.02(A)-Site-Specific Technical Studies	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
530.02(B)-Site-Specific Technical Studies - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
535 Site Surveillance/Inspection				
535.02(A)-Pre-Licensing Custodial Care Inspection Packages	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
535.10(A)-Inspection Case Files	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3
535.10(B)-Inspection Case Files - V5	Bldg 12/Vault #5	Cindy Smith	75 YRS	ENV-01.K.3
*** MNT 700 Site Specific Unique**				
700.05 Institutional Controls				
700.05(A)-Institutional Controls	GJ - Bldg 12/Room 20	Dianna Roberts	75 YRS	ENV-01.K.3

End of current text

Attachment B−2

Program Directive Guidelines and Example Program Directive

Program Directive Guidelines

Quality Assurance Instruction (QAI) 1.5 in the *Quality Assurance Manual* (STO 1) establishes the procedure and format for initiating and implementing Program Directives. These guidelines may be helpful in providing greater detail for managing the log and distribution of directives.

1. Program Directives are initiated through a site-specific log maintained in the site-specific folder on the 'condor' server and 'projects' share directory as follows: \\Condor\Projects\LM\Overall Prog\SamplingProg\ProgDir\Sites For access to this directory via a mapped network drive contact computer support at (970) 248-6123 for assistance or guidance.

2. The directory above is also the source for maintaining these guideline, directive formats, and site specific logs and directives.

3. The individual initiating a directive will use the Site Directive Log to initiate the directive by obtaining a tracking number, identifying the subject of the directive, and associated dates. Typically a directive will be in effect for a single event (e.g., June 1−June 30, 2007) or a series of scheduled events from the date the directive is initiated until the end of the fiscal year (e.g, Nov. 1, 2006−Sept. 30, 2007).

4. When initiating a directive the author will use the Directive Format template as a base and will ensure that a 'footer' is applied to the template that identifies the source document that the directive is modifying.

5. Attachments to Program Directives will clearly identify the directive (e.g., MNT-2006-03) on each attached page. Drawings prepared as attachments to directives should include the wording: Program Directive (MNT-2006-03) in or above the title block in addition to the drawing title. Reproduced drawings not specifically prepared for the directive will have the wording 'Program Directive (MNT-2006-03)' hand entered on the master copy before it is copied for distribution.

6. Check the EFFECTIVE DATE against the approving manager's signature date. Normally, approval should not occur after the directive becomes effective. The author will reconcile any discrepancies.

7. The author, or approving manager, will provide the original signed copy of the directive, including attachments, and the distribution list to Document Production.

8. Distribution lists must identify specific individuals, not organizations and include the names of persons responsible for the master and record copies of the directive. The author will ensure the correct record file number is identified on the distribution portion of the directive.

9. Document Production will retain the signed original (master copy) of the directive with the controlled document affected by the directive.

10. A record copy will be issued and maintained in accordance with the Site File Plan or LM program/project document requirements.

11. The coordinator assigned responsibility for updating the Monticello AR or IR records collection will be included in the distribution. (**Note:** Program Directives associated with annual monitoring activities for the Monticello Site must include two copies of the directive for the AR/IR collections maintained in both Monticello and Grand Junction).

12. Following hard-copy distribution, Document Production will make a PDF file of the directive and post it in the MNT Site Specific folder (refer to the path in item 1) and as applicable with the affected document posted on the LM webpage.

13. Because the sampling and analysis plan is reviewed on an annual basis, obsolete directives will be purged during the review process to ensure the plan is maintained current and not cluttered with obsolete material. Before purging any directives verify a record copy has been logged into the record file system and that both MNT and GJO AR/IR collections have received the material.

14. Program Directives will be managed consistent with these guidelines and the requirements of the Quality Assurance Program (STO 1).

Program Directive
Monticello Site

Activity or Task MMTS OU III - Post-Rod Monitoring **Directive No**. MNT-2007-01 .

Initiated By: Tim Bartlett, Site Manager

Directive Subject: Modifications to the analyte list for FY 2006 surface and ground water sampling.

Directive:

- Continue collecting samples for Total Dissolved Solids (TDS) analysis the following locations:
  Ground Water: T01-01, T01-12, 88-85, 92-08, and MW00-06
  Surface Water: Seep 2, SW00-02, SW01-02, SW01-01, and Sorenson

- TDS sample requirements are as follows:
  Bottle size/type: 125ml HDPE Preservation: filter and cool 4º C
  Field Collection: filtered Holding Time: 14 Days

- Discontinue collecting samples for isotopic uranium analysis at surface water locations

- Discontinue collecting samples for gross alpha and beta analysis at surface and ground water locations

Organization(s) Affected: Field Samplers

Affected Documents: *Monticello Mill Tailings Site Operable Unit III, Post-Record of Decision Monitoring Plan*, (August 2004), Section 4.0, "Surface Water and Ground Water Sample Management and Anlysis" and Tables 4-1 and 4-2

Justification: The changes implemented by this directive were initiated at the direction of Utah Department of Environmental Quality (UDEQ), and with the concurrence of EPA Region 8 during the May 10, 2005 FFA meeting..

Review and Concurrence:

_____ _____
Farlie Pearl, QA Specialist Steve Donivan, Laboratory Services Coordinator

Task Order Manager Approval to Issue:

_____ _____
Mark Plessinger, Task Order Manager Date

Effective Date: October 2, 2006 **Expiration Date**: September 30, 2007

Distribution: Jalane Glasgow – Record File # MSG 2.7
Farlie Pearl –Information Repository File # IR690 (2 copies)
Distribution list for the *Monticello Mill Tailings Site Operable Unit III, Post-Record of Decision Monitoring Plan*, (August 2004)

End of current text