

1889

**INACTIVE FLY ASH PILE/SOUTH FIELD REMOVAL
ACTION WORK PLAN**

XX-XX-XX

**20
REPORT**

INACTIVE FLY ASH PILE/SOUTH FIELD

REMOVAL ACTION

WORK PLAN

FEED MATERIALS PRODUCTION CENTER

Prepared by:

Westinghouse Materials Company of Ohio
Cincinnati, Ohio

For:

The United States Department of Energy
Oak Ridge Operations Office

TABLE OF CONTENTS

I. INTRODUCTION.....	1
II. DESCRIPTION/BACKGROUND.....	1
1.0 SUMMARY OF POTENTIAL THREAT.....	1
2.0 RELATED ACTIONS.....	1
3.0 ROLES OF THE PARTICIPANTS.....	2
4.0 REMOVAL ACTION.....	2
5.0 INTEGRATION WITH THE REMEDIAL ACTION.....	2
III. SUPPORT ACTIVITIES.....	3
1.0 PLANNING ACTIVITIES.....	3
2.0 DESIGN OF THE REMOVAL ACTION.....	3
3.0 TRAINING OF PERSONNEL.....	3
IV. FIELD ACTIONS.....	3
1.0 IMPLEMENTATION OF THE REMOVAL ACTION.....	3
2.0 MAINTENANCE.....	4
V. SAMPLING AND ANALYSIS PLAN.....	4
VI. HEALTH AND SAFETY PLAN.....	4
VII. QUALITY ASSURANCE.....	4
VIII. PERMITS AND REGULATORY CONSTRAINTS.....	4
Figure 1 - Location of Inactive Fly Ash Pile/ Southfield.....	6
Figure 2 - Proposed Areas for Fencing/Roping.....	7
Attachment I - Inactive Fly Ash Pile/Southfield Removal Action Schedule.....	8
Attachment II - Health and Safety Plan for the Inactive Fly Ash Pile/Southfield Removal Action....	

I. INTRODUCTION

The Inactive Fly Ash Pile/Southfield Area (IFAP/SF) is located in the southwest corner of the FMPC site and is an identified part of Operable Unit 2 pursuant to the 1990 Consent Agreement (see Figure 1). A Removal Site Evaluation (RSE) has been generated by the Department of Energy (DOE) consistent with 40 CFR 300.410 and it was determined by the DOE, being the lead agency for the Feed Materials Production Center (FMPC) CERCLA actions, that a time critical removal action is necessary. The removal action would involve the fencing/roping of areas in the IFAP/SF with elevated levels of contamination to limit access. Also, warning signs will be placed around the contaminated perimeter at the IFAP/SF. The removal action is being conducted pursuant to the Consent Agreement between the DOE and the United States Environmental Protection Agency (U. S. EPA) under CERCLA section 120 and 106(a).

The Consent Agreement requires the U. S. EPA review and comment on work plans submitted by the DOE for all removal actions. This work plan satisfies that requirement and those requirements of 29 CFR 1910.120. All activities performed under this work plan will be pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and consistent with the Office of Solid Waste and Emergency Response (OSWER) Directive 9360.0-03B, SUPERFUND REMOVAL PROCEDURES, Rev. 3.

II. Description/Background

1.0 Summary of the Potential Threat

A review of the Roy F. Weston, Inc., "Characterization Investigation Study" (CIS), showed levels of radionuclide contamination, which may pose a threat to an individual or individuals casually entering the IFAP/SF area.

2.0 Related Actions

Additional sampling for the RI/FS will be conducted in the IFAP/SF consisting of eight borings, four hand augers at depths of two feet, and four machine augers at depths of approximately twenty feet. This additional sampling will be completed prior to the implementation of the IFAP/SF Removal Action.

A proposal exists to install a pipeline along the access road east of the IFAP/SF for the South Plume Alternate Water Supply Removal Action. This removal action will not interfere with any actions or activities planned for

the IFAP/SF and its final remediation.

Another activity that may occur in this area is the removal of the lead from the firing range, which is located northeast of the running track and on the western side of the Southfield. This removal action will not have an impact on the IFAP/SF removal action.

3.0 Roles of the Participants

The DOE is the lead agency for all removal actions at the FMPC, and will coordinate and execute this removal action.

The U. S. EPA will review and approve this work plan, and provide technical guidance.

The Ohio EPA will participate in the development and review of this work plan, and provide technical guidance.

Advanced Sciences Incorporated (ASI), as a contractor to the DOE, is conducting the RI/FS program, which includes additional sampling. The additional sampling includes locations in the IFAP/SF. ASI is also providing analytical support through International Technology (IT) Corporation.

Westinghouse Materials Company of Ohio (WMCO), as the FMPC Management and Operating contractor, is responsible for the implementation of this removal action in a manner consistent with DOE and regulatory guidance.

4.0 Removal Action

The IFAP/SF Removal Action will consist of the fencing/roping and posting of signs around areas of known and suspected contamination (see Figure 2). Known areas of contamination have been identified by the CIS. Suspect areas of contamination will be verified by field radiological surveys conducted at the time of implementation of this removal action.

5.0 Integration with the Remedial Action

This removal action will be completed prior to initiation of the final remedial action for Operable Unit 2. It will mitigate potential exposure of the surrounding population to contaminants at the IFAP/SF.

III. SUPPORT ACTIVITIES

1.0 Planning Activities

Activities to be undertaken prior to the actual site work are planning, training, design, and management of the removal action. Included in this activity will be the preparation of detailed task listings and delineation of responsibilities to support the schedule given in Attachment I. These activities are required to render the area reasonably free of hazards to personnel and/or the environment until the RI/FS process has been completed.

2.0 Design of the Removal Action

Definitive design documents will be prepared for the removal action construction work.

3.0 Training of Personnel

All personnel working in the implementation of the removal action will be trained in accordance with the Occupational Safety and Health Administration (OSHA) standards found in 29 CFR 1910.120.

IV. FIELD ACTIONS

1.0 Implementation of the Removal Action

Implementation of this removal action will be performed by maintenance or construction personnel, and will include installation and construction type activities, in addition to the maintenance activities.

Initial determination of the areas to be fenced/roped will be done using the information from the CIS. This will establish the minimal extent of fencing/roping. The actual extent of the areas to be fenced/roped will finally be determined by field inspection using radiological survey techniques.

The type of fencing/roping material will be determined during the design phase. The type of material will be determined by both cost, material integrity, and long term maintenance needs. The fence or rope will be attached to support posts, probably made of steel. The approximate ground to fence/rope height will be 3.5 feet, with a berth of approximately 50 ft. from the contaminated areas.

Warning signs approximately 50 feet apart will be posted

around the perimeter of the roped-off contaminated area.

Any banner, rope or other similar materials shall be so installed as not to cause or create a safety hazard. Flagging or some other means shall be employed to reduce this hazard.

2.0 Maintenance

The fencing/roping and warning signs will be maintained by the facility owner. This activity will begin at the completion of this removal action and will continue until the remedial action for the IAFP/SF begins.

V. SAMPLING AND ANALYSIS PLAN

There will not be any samples taken for laboratory analysis since there will not be any material removed. However, if it is determined during the implementation of the removal action that sampling is needed, a sampling and analysis plan will be developed. Also, there will be a radiological survey conducted, in accordance with established FMPC procedures, to help determine the areas that will be fenced/roped. The radiological survey data from the Weston, 'Characterization Investigation Study', will be used to determine the starting points for the removal action radiological survey. From these points the survey will be moved outward to identify the maximum possible area of contamination.

VI. HEALTH AND SAFETY PLAN

The work to be performed will be in accordance with the Health and Safety Plan prepared for this removal action. A copy of this plan is provided as Attachment II of this work plan. The plan identifies, evaluates, and controls all safety and health hazards. The plan is consistent with 29 CFR 1910.120 and the FMPC Site Health and Safety Plan. Safety documentation will be prepared according to FMPC-2116 Topical Manual, "Implementing FMPC Policies and Procedures for System Safety Analysis and Review System" and DOE/OR-901, "Guidance for Preparation of Safety Analysis Reports".

VII. QUALITY ASSURANCE

The Inactive Fly Ash Pile/Southfield Removal Action will be conducted according to requirements of the overall quality assurance program at the FMPC, which is described in the site Quality Assurance Plan, FMPC 2139. The Quality Assurance Plan is based on the criteria specified in ASME NQA-1, Federal EPA Guideline QAMS-005.80 and DOE Orders 5700.6 and 5400.1. Specific quality assurance requirements will be incorporated into personnel training. The FMPC will conduct a periodic

surveillance to verify compliance with the QAP.

VIII. PERMITS AND REGULATORY CONSTRAINTS

No permits are required for this removal action.

Figure 1

1889

FMPC FERNALD, OHIO	
SITE PLAN	
VECTING-HOUSE MATERIALS CO. OF OHIO	NOT TO SCALE
USE: Ashland and Blaine	PROGRAM INFORMATION

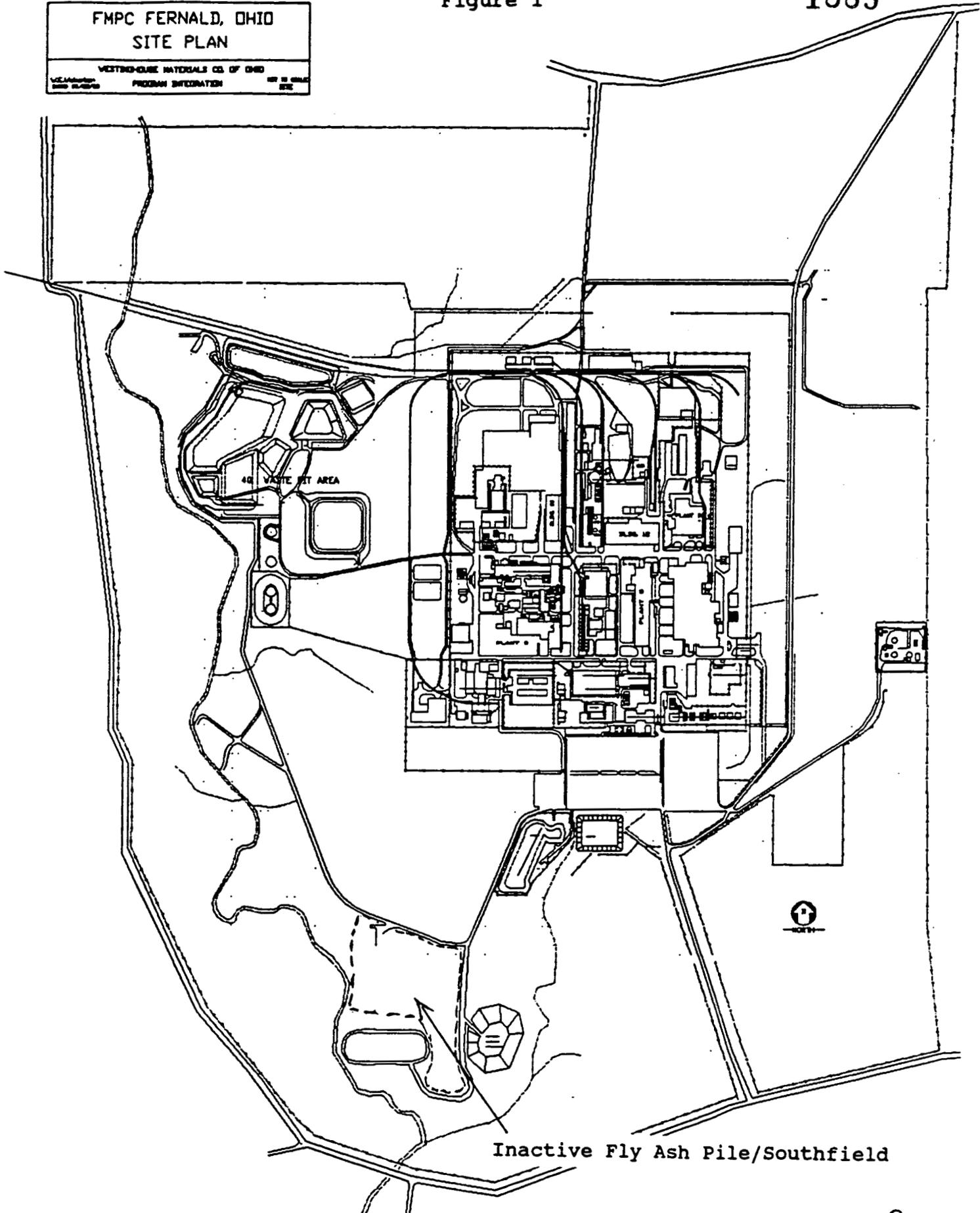
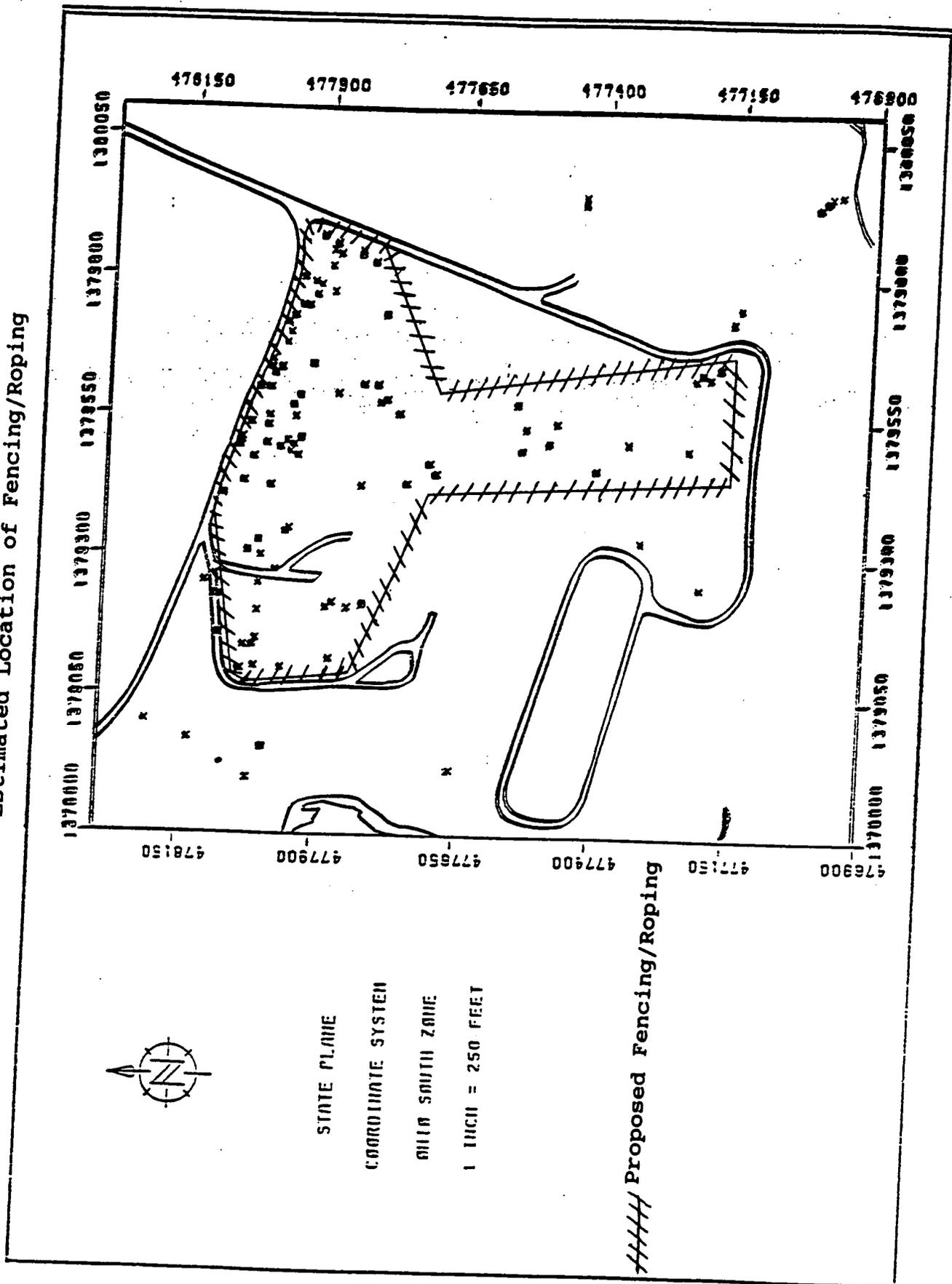


FIGURE 2
Estimated Location of Fencing/Roping



Attachment I

ACTIVITY ID	REM DUR	EARLY START	EARLY FINISH		
Y205019941	0	19SEP91	18SEP91	INACTIVE FLY ASH PILE/SOUTHFIELD REMOVAL ACTION MILESTONES	
Y205019949	0	1OCT91	30SEP91		
Y205019962	0	1OCT91	30SEP91		
Y205029910	0	5NOV90A	3APR91A	SUMMARY ACTIVITIES	
Y205029920	101	30APR91A	18SEP91		
Y205029940	8	19SEP91	30SEP91	REMOVAL SITE EVALUATION	
Y205029960	14	1OCT91	18OCT91		
Y205031000	0	5NOV90A	5NOV90A	REMOVAL SITE EVALUATION Site Walkdown Review Historical Information MCMCO Prepare Draft RSE Risk Assessment MCMCO Internal Review - Draft RSE MCMCO Prepare Final RSE and EE/CA Appvl Memo MCMCO Issue RSE and EE/CA Appvl Memorandum DOE Review RSE and EE/CA Appvl Memorandum MCMCO Revise & Resubmit RSE and EE/CA Appvl Memo DOE Issue RSE and EE/CA Approval Memorandum Removal Action Memorandum Signed	
Y205031010	0	6NOV90A	9DEC90A		
Y205031050	0	10DEC90A	28JAN91A		
Y205031040	0	22JAN91A	28JAN91A		
Y205031060	0	5FEB91A	11FEB91A		
Y205031064	0	12FEB91A	18FEB91A		
Y205031066	0	19FEB91A	20FEB91A		
Y205031068	0	21FEB91A	27FEB91A		
Y205031070	0	28FEB91A	4MAR91A		
Y205030048	0	5MAR91A	6MAR91A		
Y205040049	10	30APR91A	14MAY91		REMOVAL ACTION WORKPLAN DEVELOP NEPA-CATEX DOCUMENTATION Establish Admin Record & Info Repository ID Key Personnel/Responsibilities ID Personal Protective Equipment by Task Develop Monitoring Programs Establish Site Control Measures DOE Review & Approve Workplan Submit Workplan to EPA
Y205040024	10	1MAY91	14MAY91		
Y205041080	4	1MAY91	6MAY91		
Y205042000	4	1MAY91	6MAY91		
Y205044000	28	7MAY91	13JUN91		
Y205042020	4	7MAY91	10MAY91		
Y205042030	4	13MAY91	16MAY91		
Y205047005	22	14JUN91	15JUL91		
Y205047015	47	16JUL91	18SEP91		
Y205047010	0	16JUL91	15JUL91		
Y205053000	8	19SEP91	30SEP91	DESIGN	
Y205096000	14	1OCT91	18OCT91	REMEDATION DETAILS	

WESTINGHOUSE MATERIALS CO. OF OHIO
INACTIVE FLY ASH/SOUTHFIELD REMOVAL
LEVEL IV DETAIL SCHEDULE

Sheet 1 of 1

Date Recd: 10/1/91
FILE: 1889

* Consent Agreement Commitment Date (Removal Action Completed)

ATTACHMENT II

HEALTH AND SAFETY PLAN
FOR THE
INACTIVE FLY ASH PILE /SOUTHFIELD
REMOVAL ACTION

FEED MATERIALS PRODUCTION CENTER

June 1991

APPROVAL:


C. D. Brown for S. W. Coyle 6/14/91
S. W. Coyle, Manager
Environmental Management
Westinghouse Materials Company of Ohio

CONCURRENCE:


for J. J. Volpe, Vice President
Industrial Radiological Safety and Training
Westinghouse Materials Company of Ohio

TABLE OF CONTENTS

1.0 TASKS TO BE PERFORMED.....	1
2.0 SITE HISTORY.....	1
3.0 TASK SPECIFIC HAZARD ASSESSMENT.....	1
3.1 Physical Hazards.....	1
3.2 Chemical Hazards.....	2
3.3 Radiation Hazards.....	2
4.0 MONITORING.....	2
4.1 Goals.....	2
4.2 Monitoring Equipment and Frequency of Monitoring.....	2
4.3 Action Levels.....	4
5.0 PERSONAL PROTECTIVE EQUIPMENT.....	4
5.1 Inspection and Fencing/roping Posts Installation.....	5
6.0 SITE CONTROL.....	6
6.1 Access.....	6
6.2 Bioassay Samples.....	7
6.3 Medical Monitoring.....	7
6.4 Training Requirements.....	7
6.5 Safety Meetings.....	7
7.0 EXPOSURE SYMPTOMS.....	8
8.0 SITE ENTRY PROCEDURES.....	8
9.0 DECONTAMINATION.....	8
10.0 WASTES.....	9
11.0 CONTINGENCY.....	9
11.1 Incidents or Injuries.....	9
11.2 Pre-Emergency Planning.....	9
11.3 Lines of Authority.....	10
11.4 Evacuation.....	10
11.5 Emergency Equipment.....	10
11.6 Emergency Notification.....	10
11.7 Fire, Explosion, or Medical Emergency.....	10
11.8 Additional Information.....	11
12.0 CONFINED SPACE ENTRY.....	12

13.0 SPILL CONTAINMENT PROGRAM.....12
14.0 APPROVAL AND COMPLIANCE STATEMENT.....12

1.0 TASKS TO BE PERFORMED

The Inactive Fly Ash Pile/Southfield Removal Action will consist of fencing/roping contaminated areas, and posting warning signs around the perimeter of these areas. The principle isotopes of Uranium, Radium 226, and Thorium 230 are considered to be the primary radionuclide contaminants of concern in the areas being considered for this task.

The installation of fence/rope supports will:

<u>yes</u>	Disturb Surface Soil	<u>no</u>	Sample Surface Water
<u>yes</u>	Disturb Subsurface Soil	<u>no</u>	Sample Lagoons
<u>no</u>	Use Heavy Equipment	<u>no</u>	Use Boat
<u>no</u>	Enter Confined Space	<u>yes</u>	Involve Radioactivity
<u>no</u>	Disturb Containerized Matter	<u>no</u>	Involve Trenches

The installation of fence/rope will:

<u>no</u>	Disturb Surface Soil	<u>no</u>	Sample Surface Water
<u>no</u>	Disturb Subsurface Soil	<u>no</u>	Sample Lagoons
<u>no</u>	Use Heavy Equipment	<u>no</u>	Use Boat
<u>no</u>	Enter Confined Space	<u>yes</u>	Involve Radioactivity
<u>no</u>	Disturb Containerized Matter	<u>no</u>	Involve Trenches

2.0 SITE HISTORY

The Inactive Fly Ash Pile/Southfield area is located southwest of the production area and covers approximately 14 acres (see Figure 1). This area was activated around 1952 for the disposal of construction dirt and rubble, and fly ash. Use of this area probably terminated no later than 1968.

3.0 TASK SPECIFIC HAZARD ASSESSMENT

A preliminary review of the area and surface soil analysis surveys of the Inactive Fly Ash Pile/Southfield area indicated the potential hazards identified below. Prior to initiating the removal field activities, a reassessment will be conducted to ensure that conditions are such that a safe working environment can be provided. Any newly identified hazards will be addressed with the Industrial, Radiological, Safety and Training (IRS&T) representative(s) to determine the degree of hazard, and if any additional requirements to this safety plan are needed.

3.1 Physical Hazards

Slipping on wet grass
 Tripping over shrubs, felled trees, and debris
 Heat Stress

3.2 Chemical Hazards

No chemical hazards are anticipated based on the soil sample analysis results.

3.3 Radiation Hazards

The only potential radiation hazards would be direct contact with the contaminated soils. This hazard will be minimized since the fencing/roping activities will be conducted at a minimum of fifty feet from any suspected contaminated area.

4.0 **Monitoring**

4.1 Goals

During the contaminant source detection task, air monitoring will be performed as determined to be necessary at the time of issuance of the work permit(s) to ensure that exposure levels do not exceed established exposure limits.

4.2 Monitoring Equipment and Frequency of Monitoring

In the event that action limits are exceeded for the following areas, all work will be discontinued pending specific evaluation of the construction area.

4.2.1 Airborne Radioactivity

Air sampling will be performed for long-lived alpha radioactivity if contamination levels exceed 500 cpm with a beta-gamma (G-M) probe. Minimum detectable activity shall be at least 2×10^{-12} $\mu\text{Ci/ml}$.

4.2.2 Radioactive Surface Contamination

Radioactive surface contamination, identified by WMCO Health & Safety personnel as they perform the survey, requires radiation work permits. Radioactive surface contamination will be monitored as specified by IRS&T.

4.2.3 Chemical Hazard

Exposure to significant chemical vapor concentrations are not expected during the implementation of the tasks associated with the Inactive Fly Ash Pile/Southfield Removal

Action. Air monitoring for chemicals will be conducted by the Industrial Hygiene representative and will be conducted according to established FMPC procedures.

4.2.4 Instrumentation

The following monitoring equipment will be used if necessary for this removal action:

Beta-Gamma Contamination Monitor

Hazard Measured: Beta and gamma radiation
 Application: Monitors surfaces for radioactive contamination
 Detection Method: Geiger-Mueller tube
 General Care: Daily source and battery check
 Calibration: Six (6) months

Air Sampler (High volume)

Hazard measured: Collects airborne particulates for laboratory analysis
 Application: Measure of air activity when surface contamination is present
 Detection Method: Performed in laboratory
 General Care: Daily inspection
 Calibration: Six (6) months

4.2.5 Monitoring for Physical Hazards

Industrial Hygiene shall be contacted for heat stress monitoring when the temperature reaches 85° and readings will be taken at that time to ensure that adequate control measures are taken. Control measures will include plenty of water, rest breaks and careful attention by the supervisor in charge.

Activities will be conducted when weather

conditions are dry enough to prevent slipping on wet grass from dew or rain.

Areas where activities will be conducted will be surveyed for any objects that may cause someone to trip or fall (e.g. fallen trees or shrubs). These object will be marked with a warning ribbon and everyone working on the project will be made aware of the hazards.

4.3 Action Levels

<u>Measurement</u>	<u>Level</u>	<u>Action</u>
B e t a - G a m m a contamination on open surfaces	5,000 cpm above background	Note 1
A i r b o r n e radioactivity (long lived)	5×10^{-12} μ Ci/ml	Note 1

Notes

1. Full-face air purifying respirators with combination HEPA filter and organic vapor, acid gas, fume cartridges.
2. 1 ppm above background.

5.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All employees in the task areas will wear the following personal protective equipment while performing the required tasks.

5.1 Inspection and Fencing/Roping Posts Installation

<u>ITEM</u>	<u>NEED</u>	<u>JUSTIFICATION</u>
Air Purifier Respirator	No (yes)	Required if action levels are exceeded, or as specified by I R S & T representative
Cartridges: HEPA	No (yes)	Required if action levels are exceeded, or as specified by I R S & T representative
Hard Hat	No	
Hearing Protection	No	
Inner Gloves	No	
Rubber/Latex Boots	No	
Leather-Palm Gloves	Yes	Required as a minimum level protection of hands
Rubber/Nitrile Gloves	No	
Coveralls	Yes	M i n i m u m requirement
Plain Tyvek	No	
Process Coveralls	No	
PVC Gloves	No	
Supplied Air Respirator (SAR)	No	
Safety Glasses	Yes	M i n i m u m requirement

<u>ITEM</u>	<u>NEED</u>	<u>JUSTIFICATION</u>
Safety Goggles	No	
Safety Shoes	Yes	M i n i m u m requirement
Face Shield	No	
Saranex Tyvek	No	
Shoe Covers	No	

6.0 SITE CONTROL

6.1 Access

The task site is located in the southwestern portion of the FMPC property area, and outside of the controlled production area. Access to the area will be limited to personnel trained and certified to perform such work activities as regulated by 29 CFR 1910.120.

Chemical and/or radiological contamination is not foreseen as an impending problem with respect to this removal action. However, the work area related to this removal action will be, if necessary, organized into specific Exclusion Zones to further reduce the potential spread of chemical or radiological contamination.

The Exclusion Zone is an area of high potential risk of injury or contaminant exposure due to physical, chemical, or radiological hazards. Access to the Exclusion Zone is restricted by the supervisor-in-charge to trained and certified employees, as regulated by 29 CFR 1910.120, required to enter the zone to complete the tasks. The Exclusion Zone will be marked with barrier tape or other easily recognizable devices. The zone may be expanded if airborne hazards are detected. All areas requiring the use of respiratory protection are included in the Exclusion Zone. There will be one entrance to this zone. A map designating the location of the Exclusion Zone(s) will be generated prior to performing the tasks associated with this removal action.

If necessary, IRS&T representatives will require a Contamination Reduction Zone, consisting of step-off pads, at the exit to the Exclusion Zone. This zone will be used for removal of disposable personal protective equipment and for the cleaning of contaminated equipment.

6.2 Bioassay Samples

Personnel involved in this project are required to participate in a routine periodic urine assay program. Any suspected exposure to hazardous substances shall be reported and require additional sampling.

6.3 Medical Monitoring

In accordance with 29 CFR 1910.120 and OSHA requirements, all WMCO and WMCO subcontractor personnel are required to participate in a medical monitoring program which includes:

- A baseline medical examination
- Annual medical examination
- Medical examinations may be required after potential exposures
- WMCO respirator clearance for users

Prior to the start of work, personnel involved in this project shall be identified by name and badge number. Each individual shall be subject to a medical surveillance approval by the Director of Medical Services. The approval statement shall certify that each individual is medically qualified to perform the work and is physically fit to wear PPE.

6.4 Training Requirements

All WMCO and WMCO subcontractor personnel assigned to the tasks will, as a minimum, meet the following training requirements including:

- Documented safety meeting to review this health & safety plan, including site specific hazards and procedures;
- WMCO radiation safety training;
- WMCO respiratory training and fit test or equivalent approved by WMCO Industrial Hygiene;
- 40-hour OSHA training;
- 8-hour annual refresher training
- 8-hour supervisory training (for supervisors)
- 24-hour supervised field experience

6.5 Safety Meetings

The first safety meeting shall be held prior to the start of work and shall include a complete review of this plan.

A safety meeting, which must be documented, shall be conducted prior to the start of each day's work

activities. Fencing/roping activities include locating the areas to be cordoned off and installing fencing/roping posts. These safety meetings will cover the following applicable subjects:

- work operations
- personnel protective equipment
- all monitoring data
- hazard communications
- monitoring tests and results
- decontamination
- task organization
- physical stress
- emergency procedures
- communications
- general safety
- housekeeping

7.0 EXPOSURE SYMPTOMS

Exposure to low levels of radioactivity do not produce acute exposure symptoms. Such exposures may cause delayed effects such as cancer. Such exposures are to be kept as low as reasonably achievable. No treatment is anticipated for the predicted contaminants and concentrations. See Section 11 for contingency plans.

8.0 SITE ENTRY PROCEDURES

During the fencing/roping activities the following procedures will apply:

- Identify the Construction Zone, Exclusion Zone, Contamination Reduction Zone, and break area;
- Perform daily safety meetings to familiarize the team with site specific hazards;
- Discuss alternate communications signals (if applicable);
- Use buddy system. Teams of no less than two individuals will be used for all activities within an Exclusion Zone.

9.0 DECONTAMINATION

Equipment for decontamination of radiological or chemical hazards shall be kept available in the area surrounding the Exclusion Zone if such is determined necessary by supervisor or by either Radiological Safety or Industrial Hygiene prior to the initiation of the activity.

Decontamination will be performed consistent with the following FMPC Standard Operation Procedure, OSH(SP)-P-35-017, and Topical Manual FMPC-2084. In addition, specific RI/FS decontamination procedures for the Facilities Testing Program will be followed when appropriate.

10.0 WASTES

All potentially contaminated waste materials resulting from site activities will be collected and placed in drums or other containers. Disposable protective clothing will be placed in plastic bags and disposed of as compacted, potentially contaminated waste.

Drums or containers shall meet DOE 49 CFR Parts 171-178, EPA 40 CFR Parts 264-265 and 300, and OSHA requirements. Hazard warning shall be immediately applied to all drums as specified by WMCO management/supervisors and WMCO Solid Waste Compliance.

11.0 CONTINGENCY PLANS

11.1 Incidents or Injuries

For the possible intake of radiological substances see the statement on submission of urine samples for radiation exposures in WMCO Standard Operating Procedure (SOP) 11-C-245.

Incidents of injuries involving potential intake of other hazardous substances shall be reported to supervisor and the WMCO Communications Center by the involved employee. An Incident Investigation Report will be completed by the involved employee.

All injuries shall be promptly reported to WMCO Medical department. Minor injuries shall not be solely field treated. For serious injuries the FMPC ambulance shall be requested by calling 738-6511 or using a radio contacting "Control".

11.2 Pre-Emergency Planning

During the training and pre-work safety meetings, all employees involved in this task shall be trained and reminded of the provisions of the plant emergency procedure, alarm signals and communications, evacuation routes, emergency reporting, and the importance of maintaining communications with FMPC WMCO Control via 2-way radio or cellular phone. A test must be performed on all equipment prior to initiation of daily activities to verify performance.

11.3 Lines of Authority

The supervisor in charge has the primary responsibility for the prevention of emergency conditions. In the event that an emergency does occur, the individual involved or observing the condition shall immediately notify a supervisor, the communications center or the WMCO Assistant Emergency Duty Officer (AEDO). The AEDO is responsible for ensuring that corrective actions are been implemented, the appropriate personnel notified, and reports completed as specified in Section 11.1.

11.4 Evacuation

Even though the tasks are performed on DOE property, the 3-3, 3-3 alarms and the Emergency Message System may not be heard in the task area. A 2-way radio shall be used by WMCO Control to instruct the individuals working on the task to go to their designated rally point after the alarms have been sounded. Personnel shall immediately proceed to the rally point. The FMPC designated rally points within the DOE property are shown on Figure 2. Personnel will follow instructions given by the rally point coordinator and participate in the accountability process. When an all-clear condition has been achieved, personnel will be released from the rally point.

11.5 Emergency Equipment

The following safety equipment, locations to be identified at safety meetings, is available for employee usage at the construction zone.

- two-way radio
- respirators
- clean-up materials

11.6 Emergency Notification

All emergencies shall be reported immediately. Emergencies can be reported by cellular telephone by dialing 738-6511; by contacting the communications center via two-way radio.

11.7 Fire, Explosion, or Medical Emergency

In the event of a fire, explosion or medical emergency, the communication center shall be notified immediately by two-way radio or by calling 738-6511. The communication center operator will activate the emergency response team

and dispatch them to the appropriate location (refer to 11.1). Personnel in the immediate area should evacuate to a safe position and await instructions.

A map delineating the route to the medical facility, which is in back of Building 53, is shown on Figures 3 and 4. Complete medical assistance will be provided by trained professional FMPC medical personnel.

11.8 Additional Information

11.8.1 Hospitals

The WMCO Medical Facility (Building 53) is the primary choice for on-site injuries. The WMCO ambulance will transport the injured to the nearest hospital if necessary. WMCO maintains an emergency response capability which includes an ambulance and EMT medical personnel.

11.8.2 Emergency Telephone Numbers

The following telephone numbers are FMPC site telephone numbers.

<u>Name</u>	<u>Number</u>	<u>Radio</u>
Ambulance:	738-6511	control
Fire:	738-6511	control
Emergency Response	738-6511	control
Industrial Hygiene	738-6207	357
Radiation Safety	738-6889	355
Fire and Safety	738-6235	303
Assistant Emergency Duty Officer (AEDO) or	738-6431 6295	202

12.0 CONFINED SPACE ENTRY

A Confined Space Entry Permit will not be required for the activities to implement this removal action.

13.0 SPILL CONTAINMENT PROGRAM

The present conditions of the area under consideration for this removal action do not warrant providing a spill prevention plan. However, if during sampling and/or surveying, conditions change during the course of work, spill prevention/control measures will be taken in accordance with FMPC 2065, "FMPC Spill Prevention Control and Countermeasure Plan."

14.0 APPROVAL AND COMPLIANCE STATEMENT

This site specific safety plan was produced for use by WMCO employees and subcontractors. It was intended for the FMPC and specifically for personnel performing the following activities:

- Inspecting and determining the actual areas to be fenced/roped off;
- Installing the fencing/roping posts;
- Installing the fence/rope.

The personnel performing these tasks must read and understand the attached site specific health and safety plan and agree to follow its provisions¹. Written documentation with signatures of those personnel performing these tasks must be maintained.

This Project/Task Specific Health and Safety Plan is based on information available at the time of preparation. Unexpected conditions may arise which require reassessment of safety procedures. It is important that personnel protective measures be thoroughly assessed by the supervisor in charge. The supervisor shall follow all applicable SOP's, permits, work plans and this H&S plan for the correct PPE. Should the supervisor question the need of, or lack of PPE he/she may call the IRS&T representative. Unplanned activities and/or

¹Compliance with the provisions of the Health and Safety Plan may be audited through announced or unannounced site visits. Be sure that the provisions of this safety plan are implemented and document the reasons for field actions/changes when they are necessary. Site visits may be performed by the DOE or WMCO personnel.

change in the hazard status shall require a review of and may require changes in this plan.

Changes in the anticipated hazard status or unplanned activities are to be submitted as an amendment to this Project/Task Specific Health and Safety Plan.

Amendments must be approved by the plan author and IRS&T prior to implementation of the amendment.

Figure 1

FMPC FERNALD, OHIO
SITE PLAN
VESTINGHOUSE MATERIALS CO. OF OHIO
DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY
PROGRAM OPERATIONS DIVISION

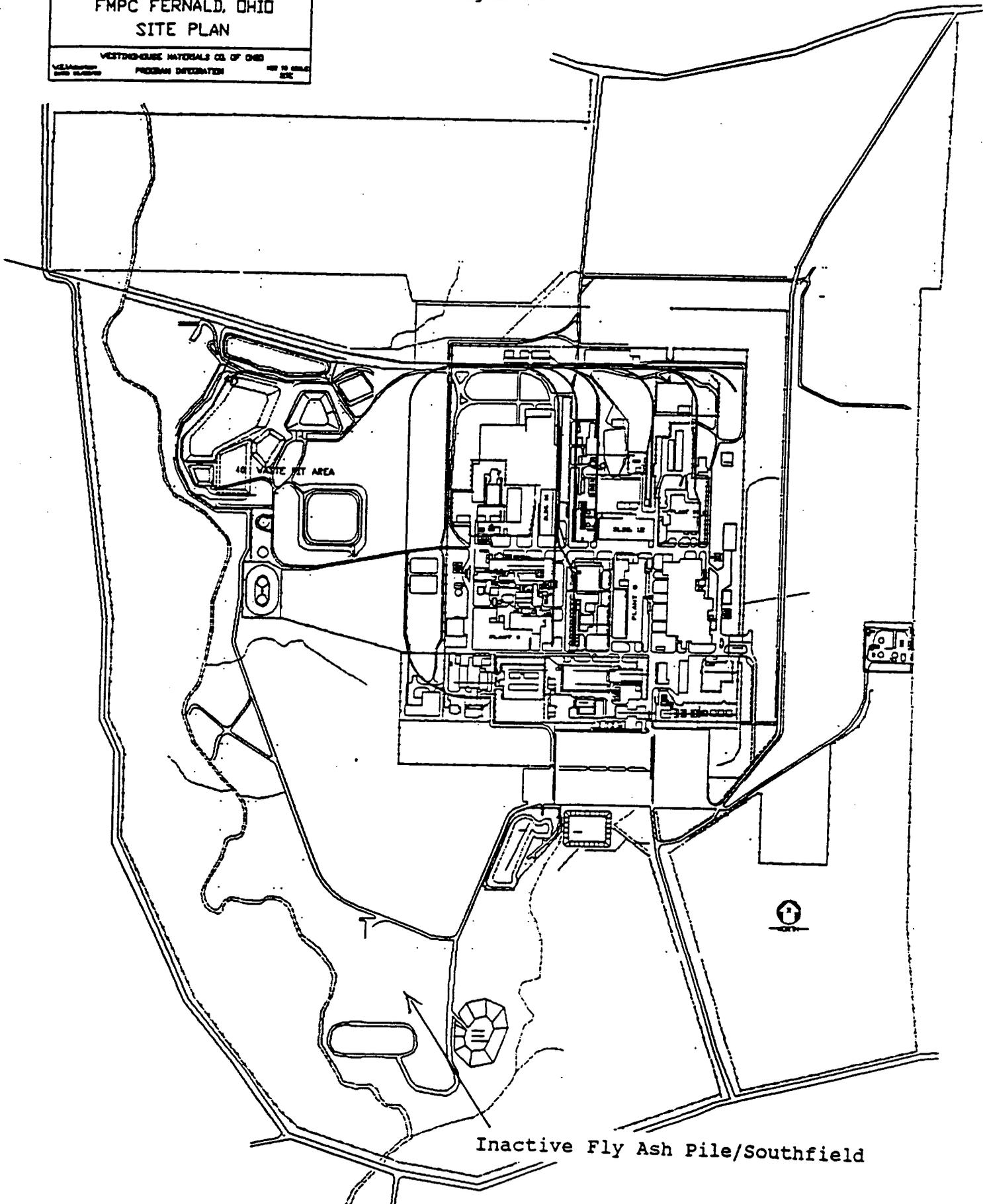
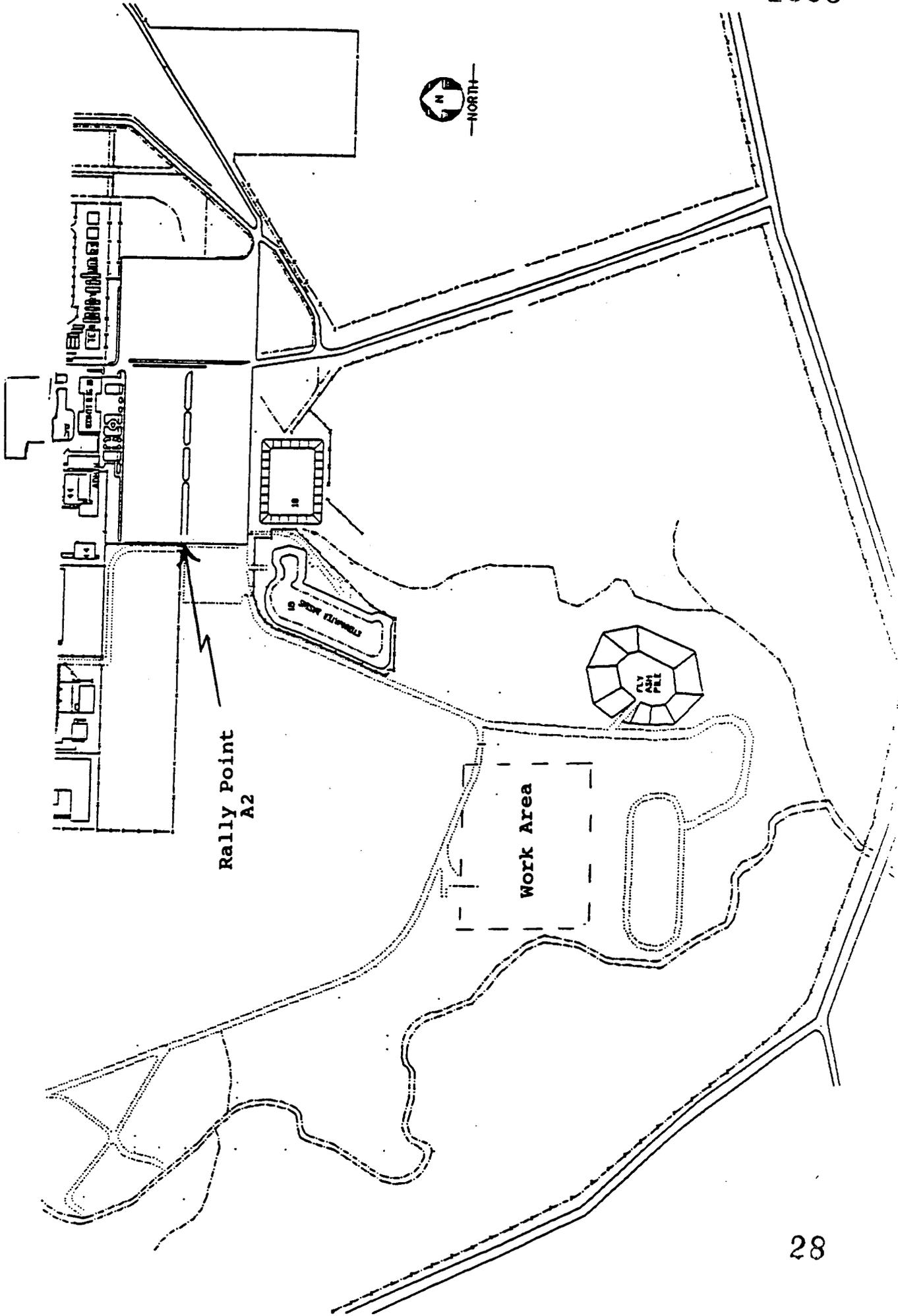


Figure 2
Suggested Rally Point



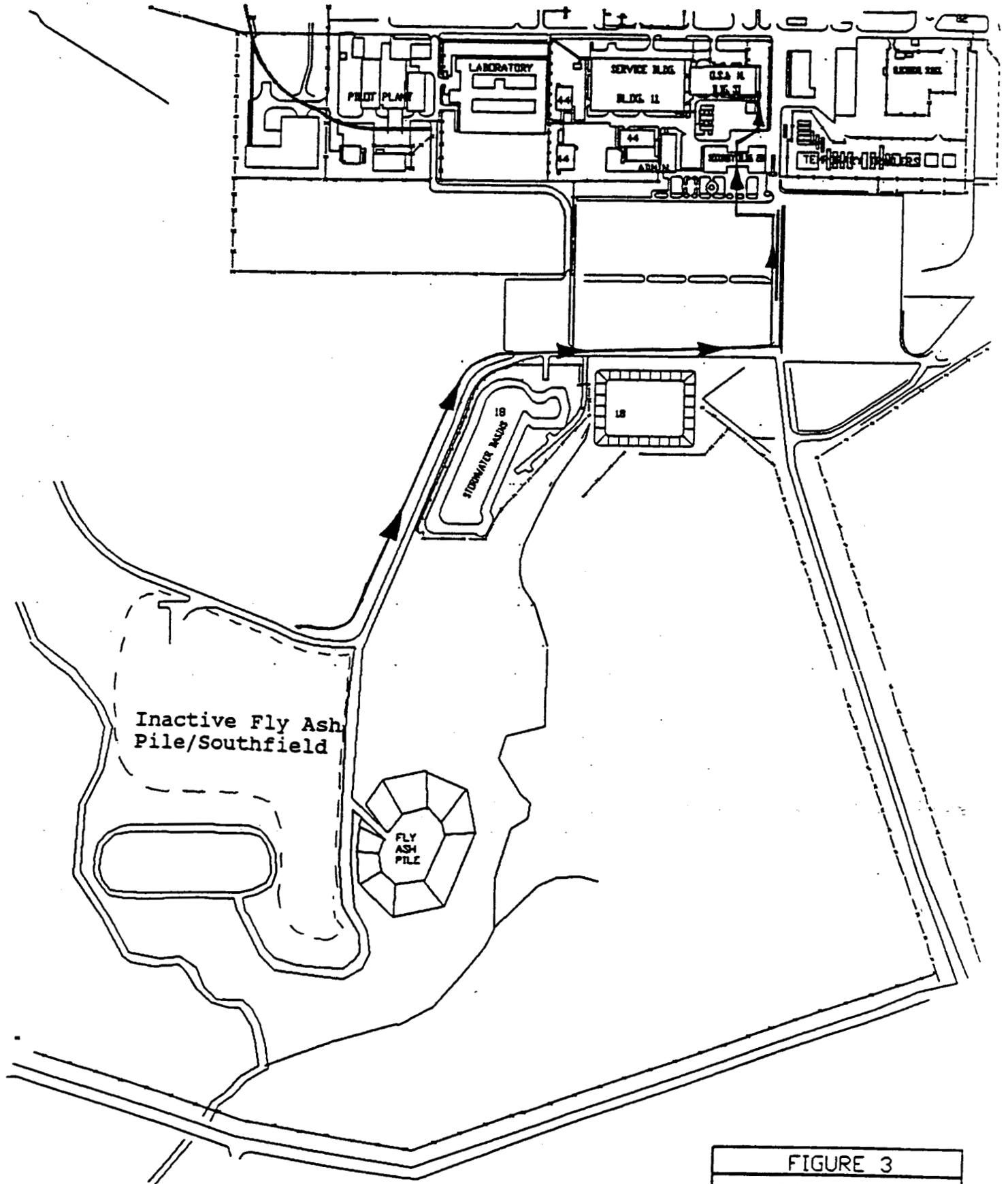


FIGURE 3
ROUTE TO MEDICAL FACILITY
FROM IFAP/SF
DATE: 6/8/78

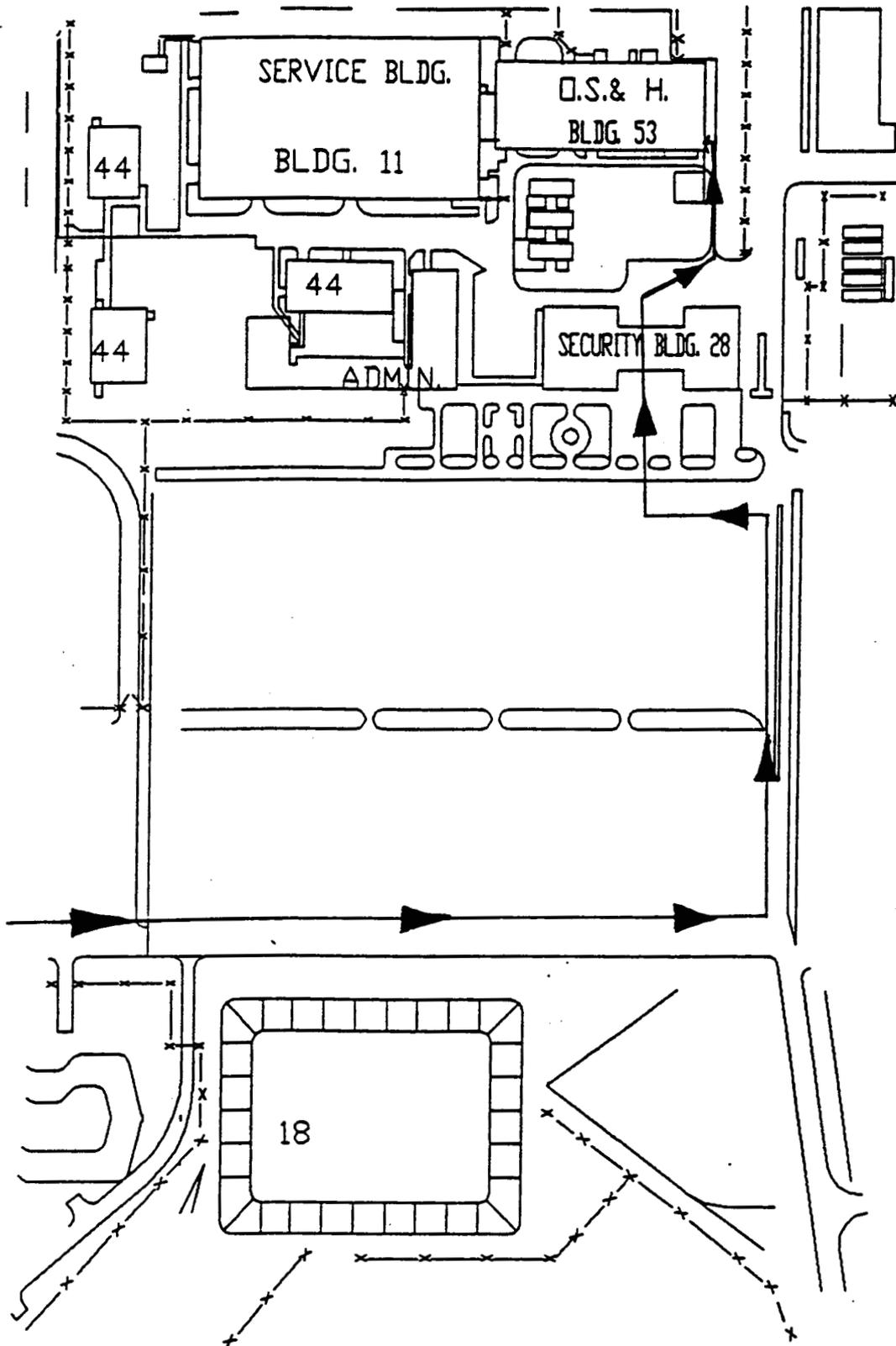


FIGURE 4
ROUTE TO MEDICAL FACILITY
FROM IFAP/SF (ENLARGED VIEW)
VEV DATE: 6/6/91