

779 DOP - APRIL 1997 DRAFT

Review Comment Sheet

Section 1: DESIGN PACKAGE AND REVIEWER IDENTIFICATION

1. IWCPI/Authorization Project Number KTBG3200	2. Reviewer's Name (Print) D.S. WARFIELD	3. Organization QA	4. Location T130J	5. Phone No. 4187	6. Pager No. 4217	7. Page 1 of 6
8. Type of Review	<input type="checkbox"/> Design Check	<input checked="" type="checkbox"/> Interdiscipline Review	9. Due Date 5/15/97			

Section 2: REVIEW COMMENTS AND DISPOSITION

10. No.	11. Reference: Page, Para, Dwg #, etc.	12. Comments: Provide comment and proposed resolution	13. Proposed Comment Disposition		14. Date Comment Closed
			<input checked="" type="checkbox"/> Accept	<input type="checkbox"/> Reject	
1.	DOP-11	Please revise paragraph 2-1.6 as shown on the page provided.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2.	DOP-32	The final sentence in paragraph 3-2 is somewhat garbled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3.	DOP-36	Paragraph 4.1.2 uses the R/W	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3.	DOP-36	Section 4.1.2, second paragraph, states that DDO's were not formally completed, but were used in a 'mental' evaluation. This statement and method of conducting business is not consistent with the DPP and required DDO process.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4.	DOP-89 through DOP-91	Please see the minor wording changes attached for the RA SECTION (10.0).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

15. <input type="checkbox"/> No Comments <input type="checkbox"/> No impact or relevance to discipline or organization	18. FINAL COMMENT DISPOSITION: I have made final disposition for all comments not resolved to the satisfaction of the reviewer. Technical justification for the disposition of these comments is attached.
16. Reviewer - Signature <i>[Signature]</i>	19. Responsible Manager - Name (Print) Responsible Manager - Signature
17. Date 5/15/97	21. Date

2.1.5 Project Cost and Schedule

The Project Cost and Schedule Lead reports to the PM and is responsible for establishing, maintaining, and reporting project cost and performance utilizing the computerized Primavera system. The project cost and schedule Lead is responsible for generating status reports and schedules as requested by the PM.

2.1.6 Quality Assurance (QA) Engineer

NON-CONFORMANCE

The QA Engineer coordinates and initiates Corrective Action Reports, Quality Conditions Reports and ~~Non-Conformance~~ Reports, and assists other project personnel in the same. The QA Engineer receives direction from the PM regarding project priorities. QA Engineer reports to and receives technical direction from the QA Manager. The QA Manager reports to the Environment, Safety, Health, and Quality (ESH&Q) Manager.

QA Engineer participates in document and procedure reviews, performs surveillances and inspections of selected project activities, and provides direction to project personnel on Quality Assurance requirements.

2.1.7 Project Engineer (PE)

The PE is responsible for completing engineering activities supporting the decommissioning project. The PE is responsible for complying with Engineering Department Procedures applicable to the project scope of work. He/she receives daily project direction from the PM and reports to the Engineering Manager for technical overview.

Responsibilities include the following:

- Developing, reviewing, and approving reports and studies for technical quality.
- Developing, reviewing, and approving project specifications and material requisitions.
- Approval disposition of non-conformance reports.
- Writing and approving design changes (Field Change Requests/Field Change Notices, FCR/FCN) required during the decommissioning project.
- Exercises operational supervision over the engineers of all disciplines assigned to the project or in support of the project.
- Directing and coordinating engineering activities for the project.
- Assistance in establishing the detailed project scope, work plans and procedures.
- Developing, reviewing and approving engineering orders (EOs) and IWCP work packages.
- Reviewing engineering and IWCP work packages to ensure they are in conformance with applicable administrative requirements.
- Compilation of BOM and oversight of Procurement activities.
- Work with the Regulatory Compliance Engineer to ensure all project activities are completed within the requirements of applicable regulations.

2.1.8 Decommissioning Operations Superintendent

The Decommissioning Operation Superintendent reports to the PM and is responsible for:

- Scheduling all surveillance and RCRA inspections.

10.0 QUALITY

10.1 INTRODUCTION

Currently RMRS is responsible for the management ^{the} control and oversight ^{control and} of the Building 779 Cluster Decommissioning Project. As such, RMRS QA plan will be used to monitor the quality aspects for the project activities. RMRS has developed a QA Program Description (QAPD) document number ~~95-QAPD-001~~ which will be used to ensure the Building 779 Cluster Decommissioning Project activities meet the necessary quality requirements. The QAPD ~~that~~ describes roles, responsibilities, and methodologies for ensuring compliance with DOE Order 5700.6C (the Order), and 10 CFR 830.120 (Price-Anderson Amendments Act, also known as the Rule). Since the Order and the Rule are inclusive of the same criteria, RMRS incorporates the requirements into a single QAPD. The QAPD is a controlled document and is distributed through the RMRS document control system.

^{Deleted} The 779 Cluster Decommissioning Project will follow the requirements of the RMRS QAPD. The development and approval of the Decommissioning Program Plan will further define the requirements applicable to quality assurance needs for decommissioning projects, and will be utilized to meet the governing Quality Assurance Program ~~Plan~~ ^{Description}.

10.2 PURPOSE AND SCOPE

The RMRS QAPD defines the strategy and controls currently employed, or to be developed and implemented by RMRS to consistently deliver products and services that meet the requirements of customers/stakeholders. The QAPD serves as a map of the current controls employed by RMRS, and presents a concise strategy for the continuing development of the RMRS QA Program. Currently, RMRS is implementing the established Site controls, procedures and documents approved by the Integrating Management Contractor, Kaiser-Hill.

The QAPD is relevant and applicable to the specific operations of RMRS and its subcontractors, and where applicable, to the interface controls between RMRS and Kaiser-Hill, and between RMRS and other Kaiser-Hill subcontractors. When Safety Class or Augmented Quality conditions exist, Project Management may decide to obtain subcontractors who have earned the "Approved Supplier" status. Approved suppliers are required to submit a quality program which meets equivalent standards to RMRS's QAPD. The evaluation and approval of such programs is performed by Kaiser-Hill for placement into the Site Approved Supplier List.

10.3 PROGRAM REQUIREMENTS

The QAPD identifies the QA elements of the RMRS QA Program and defines them ^{referenced} in the context of implementing programs and controls. Specific programs and controls are also ~~identified~~ in the QAPD, such as floor level procedures, plans, and documents used to control all activities involved in the 779 Cluster Decommissioning Project. The QAPD is binding on all RMRS personnel. RMRS personnel understand the program's impact from training, indoctrination, and the commitment evidenced by management.

10.3.1 QA Systems And Description

General

RMRS requires that decommissioning activities be appropriately planned in accordance with the provisions of the QAPD, and that when activities deviate from planned outcomes and indicate significant conditions adverse to quality, RMRS personnel are required to stop the activity until corrections can be made.

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RMRS places accountability for quality with the individuals accomplishing the work activities, and further holds those individuals accountable for seeking means to continuously improve. RMRS provides its participants with the tools, continuing training, and latitude to do the right things, above merely doing things right.

All RMRS personnel are responsible for performing activities in accordance with approved documents; identifying and participating in quality improvements; knowing customers, suppliers, and processes with which associated; exercising stop work authority over significant conditions adverse to quality; and for attending training.

RMRS QA Organization

The QA organization has a designated group responsible for quality assurance program implementation and oversight of the Engineering/Construction/Decommissioning department.

The 779 Cluster Decommissioning Project is receiving QA support, and is taking a proactive approach in its work planning activities to ensure programmatic compliance and to streamline QA review cycles.

The RMRS QA Program is inherent with the work being performed. This is accomplished during the planning of work, through the participation of Quality Engineers, reducing the need for extensive inspections and assessments. The primary principle supported is that the achievement of quality is embedded in the work processes, and that assessment should only be a tool for monitoring and continuous improvement.

10.3.2 Personnel Qualifications And Training

Project personnel are qualified to perform their respective tasks based on a combination of related experience, education, and training. Education and experience constitute the primary means of qualification. Decommissioning management, in conjunction with training program administrators are responsible for providing any additional skills and training prior to assigning employees specific project duties. Typical training methods include computer based training, classroom instruction, required reading, and on-the-job training. Qualification requirements and training records are maintained and retrievable through the project manager, at a centralized training record repository, maintained and operated by RMRS.

The RMRS QA Manager establishes requirements for the competency of individuals planning, developing, assessing, and inspecting QA related work activities. Quality Engineers have the training, qualifications, technical knowledge, and experience commensurate with the scope and complexity of the decommissioning activities being evaluated. Evidence of competency, and maintenance of competency has been established and recorded within the QAPD, and related implementing procedures.

10.3.3 Improvement

Employee participation in the assurance of quality and the continuous improvement process is gained through taking ownership of their processes, and actively seeking means to improve those processes. Decommissioning project management will use lessons learned in each phase of the project to improve succeeding phases. The project team approach is one of the management tools employed to enhance productivity and continuity throughout the project.

Items, materials and hardware that do not meet established requirements are identified, segregated, controlled, documented, analyzed and corrected in accordance with the Non-Conformance Reporting (NCR) process. Activities, services and processes that do not meet established requirements are also identified and corrected in accordance with the Quality Condition Reporting (QCR) process. Quality Engineers are responsible for supporting the NCR and QCR processes, and for assisting in the disposition and correction of identified deficiencies.

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10.3.4 Documents And Records

Quality affecting documents, such as work plans, operating procedures, and health and safety plans are prepared and controlled in accordance with approved processes. These documents receive the required reviews and approvals, they are uniquely identified, and their distribution is formally established. Other essential policies, plans, procedures, decisions, data, and transactions of RMRS are documented to an appropriate level of detail. Document reviews by subject matter experts, management and Quality Assurance are performed as appropriate and as specified in governing procedures. Quality records, as defined by approved processes and plans are prepared and managed to ensure that information is retained, retrievable, and legible. The document and record processes for the 779 Cluster Decommissioning Project are the same as the established controls for all E/C/D projects, maintaining a consistent, and approved method.

10.3.5 Work Processes

Decommissioning processes and activities are controlled to a degree commensurate with the risks associated with the decommissioning process or activity. Documented and approved instructions are incorporated to control decommissioning processes and activities, maintaining compliance with reference standards, engineering specifications, workmanship criteria, quality plans or other requirements.

Work is controlled from the onset of the project through project management procedures, engineering procedures, records management procedures, construction management procedures, and work packages. The IWCP is the formalized process that controls the development of the decommissioning work packages. Well established Waste Management Procedures and other controls ensure that the generation and handling of wastes meet governing requirements as well.

10.3.6 Design

Sound engineering, scientific principles, and appropriate technical standards are incorporated into all design activities to assure intended performance. Site infrastructure programs, primarily The Conduct Of Engineering Manual (COEM), provide controls for the design of items and processes. Design work includes incorporation of applicable requirements and design bases, identification and control of design interfaces, and verification or validation of design products by independent, qualified individuals, subject matter experts or groups other than those who performed the work. The verification and validation is completed before approval and implementation of the design.

The design control processes for the 779 Cluster Decommissioning Project are, existing, well established, approved and documented procedures for the control of design inputs, outputs, verifications, reviews, changes, modifications, and configuration change control. Design control requirements for procured design and engineering services are also incorporated into procurement specifications.

10.3.7 Procurement Of Items And Services

The Decommissioning Program implements a procurement and subcontracts system that complies with the appropriate protocols required by the Site. All procurement documents receive a documented independent quality review ^{by} Quality Engineers, to assure incorporation of appropriate quality assurance requirements, ~~and health and safety requirements~~. The QA organization reviews procurement documents to ensure that the requirements for items and services are clearly depicted, including specific performance requirements. Procurement documents are retained and administered in accordance with approved procedures.

RMRS employs control systems for identification, maintenance, and control of items, including consumables. The controls ensure that items are properly labeled, tagged, or marked, and that

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Review Comment Sheet (continued)

Instructions: Number all continuation pages in Block 3.

Section 1: DESIGN PACKAGE AND REVIEWER IDENTIFICATION

1. IWCPI/Authorization Project Number
KTBG3200

2. Reviewer's Name (Print)
R. Carr

3. Page
4 of **5**

Section 2: REVIEW COMMENTS AND DISPOSITION (continued)

No.	Reference: Page, Para, Dwg #, etc.	Comments: Provide comment and proposed resolution	Proposed Comment Disposition		Date Comment Closed
			Accept Reject	Plans to Incorporate Comment, OR Justification for Rejection	
9	7.1.2	There are no state, local, or city regulations which address worker safety and health (occupational reg'ts), ARARs (Section 9) do not address occupational safety and health. Suggest a revision of this section which would mirror RMRS's policy on safety and health (found in RMRS's Safety and Health Program)	<input checked="" type="checkbox"/>	The sentence is focused on de-missioning activities that are regulated. The ARARs, for the most part, focus on protection of human health and the environment. Revised slightly.	
10	7.1.5	Consistent with Enhanced Work Planning (ENP), referenced earlier in the DOP, craft personnel shall be involved with the development of AHA's. Revise section accordingly.	<input checked="" type="checkbox"/>	Incorporated	
11	7.3.1	What are the drivers (requirements) for the training that is made reference to for various specific work tasks. Suggest a revision which makes reference to the specific requirement	<input checked="" type="checkbox"/>		
12	7.5.1	There appears to be a mixing of Safety & Health Program & Safety & Health Plan. Elements of a Safety & Health Plan are specified in 29 CFR 1926.65 (1910.120). Elements of a S & H Program	<input checked="" type="checkbox"/>	Removed plan and replaced with program.	

Apr 97

Review Comment Sheet

Section 1: DESIGN PACKAGE AND REVIEWER IDENTIFICATION

1. IWC/Authorization Project Number **KTBC3200** 2. Reviewer's Name (Print) **R. Carr** 3. Organization **RmRS ESH&Q** 4. Location **116** 5. Phone No. **2970** 6. Pager No. **5259** 7. Page **1** of **5**

8. Type of Review Design Check Interdiscipline Review Other (specify): **9. Due Date 5/15/97**

Section 2: REVIEW COMMENTS AND DISPOSITION

10. No.	11. Reference: Page, Para, Dwg #, etc.	12. Comments:	13. Proposed Comment Disposition		14. Date Comment Closed
			Accept	Reject	
1	Section 2.1.2.2	This is not how RmRS is currently organized with respect to radiation protection. Suggest that this section be revised to reflect current RmRS organization with respect to rad. protection and occupational safety.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Section 2.1.2	Ensuring Occupational Safety & Health requirements are factored into project work packages is not a responsibility of the Occupational Safety Officer, but rather the Project Manager. Safety verifies, provides oversight, and performs safety/I.H. monitoring. Suggest this section be revised to reflect these responsibilities. Safety (occupational/rad. protection) is a line responsibility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Section 3.2.1	"Another important consideration is minimization of occupational exposure." Occupational exposure to what?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

15. No Comments No impact or relevance to discipline or organization

FULL CONCURRENCE: I have reviewed the document referenced above from my organization's discipline-specific point of view and concur fully with its implementation. All comments and concerns have been resolved to my satisfaction.

16. Reviewer - Signature _____ 17. Date _____

18. FINAL COMMENT DISPOSITION: I have made final disposition for all comments not resolved to the satisfaction of the reviewer. Technical justification for the disposition of these comments is attached.

19. Responsible Manager - Name (Print) _____ 20. Responsible Manager - Signature _____ 21. Date _____

REVIEW COMMENT SHEET

Time Spent on Review: _____ hrs.

If questions on content, please call the SME:

Return to: 3090 Name John Whiting Ext. 7592 Location 130 Name Mark Hickman Ext. 7145 Page _____ of _____
 FAX _____

Please review the attached document: _____ Rev. _____ Title DOP 779 Cluster
 Comment Due Date: May 15, 1997 April 1997 Draft

Internal Review Parallel Review Verification Validation Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.
 1-A03-PPG-004 provides complete definitions of General and Mandatory comments.

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE
	36	4.1.2 2nd sent.	ALL ROOM will be surveyed some more extensively than others. This sentence needs to be reworded.	Addressed in characterization rewrite Incorporated	8-28-97
	36	4.1.2 2nd para 4th sent	AGAIN, surveys must be taken. RLLC can't be complete w/out surveys. THE RESOLUTIONS must be involved in this process.		
	37	4.1.2 1st sent	AGAIN, NO! THESE must be surveys take as part of the Recon. Level Characterization.		
	37	4.1.2 para. #2	Why? no special chemical characterization? ??		
	38	#7	List PCBs add "light ballasts"		8-28-97 KBR

POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

No Comments
 This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.

C. Mark Asgiden Name _____ Signature _____ Date _____
 Ext./Pager/Fax _____ Bldg./Dept./JAGM _____

Resolutions Accepted _____ Name _____ Signature _____ Date _____

NOTE: These reviews are completed by qualified reviewers in accordance with 1-A03-PPG-004 in concert with 1-A01-PPG-001 and 1-A02-PPG-003.

REVIEW COMMENT SHEET (continued)

Review comments for document: DOP 779 Cluster Rev. April 1997
Draft

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INITIAL/DATE
	40	4.2 <i>draft</i>	where is this in the DPP??	Reference to the DPP has been removed until such time as it's approved	8-28-97 KOR
	53	8.2	First Sentence delete.	Not deleted. This is how RFBTs define mixed waste.	KOR
	53	8.3 4.3	Last Sentence delete "where feasible"	Deleted	KOR
	72	9.4.2 2.1.2 <i>para</i>	2nd Sentence what does this mean? EXCLUSIONS UNDER DOE'S NEPA Regs.	Deleted reference to DOE.	KOR

FOC/Reviewer: (Comments not signed by the FOC/Reviewer will be considered as unofficial comments)

Resolutions Accepted

Signature: C. Marc Ayjilar Date:

Signature: EFA Date: