



**Rocky Mountain  
Remediation Services, L.L.C.**  
... protecting the environment

## DIRECTIVE

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### HEALTH AND SAFETY OPERATIONS

OPS-DIR-001  
Revision 1  
Date Effective: 05/15/97

APPROVED: Frederick P. [Signature]  
Sr. Vice President, Operations

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#### 1. PURPOSE

The purpose of this directive is to identify the expectations regarding health and safety during conduct of operations. This directive closes Corrective Actions Numbers 11 and 12 for the T-3/T-4 Action Plan.

#### 2. SCOPE

The scope of this directive covers monitoring policy for work outside of positive containment, identifies the radiological containment policy, and covers management of unknown hazards. This directive is applicable to all activities conducted within RMRS Operations.

#### 3. DIRECTIVE

It is the policy of RMRS to conduct its operations in a manner that ensures the health and safety of all its employees, contractors, all co-located workers, the environment, and the general public. RMRS believes that all accidents and injuries are preventable; and with proper identification of the risk, aggressive actions to mitigate the risk and a program to supervise and audit the activities, zero injuries are achievable. RMRS shall ensure that hazardous exposures (radiation, chemical, physical, etc.) to all workers and the public and releases of these hazards to the environment are maintained below regulatory limits and deliberate efforts are taken to further reduce exposures and releases in accordance with a process that seeks to make any such exposures or releases as low as reasonably achievable. RMRS is fully committed to implementing a program of the highest quality to ensure the safety of the workers that consistently reflects this policy. Each worker should understand that proper radiological control and safe work practices are an integral part of their daily duties to ensure the safety of the workers. Each worker also has the right and obligation to stop work if unsafe conditions are imminent.

It is the intent of RMRS to:

- (1) Require air sampling be performed in occupied areas where, under typical conditions, an individual is likely to receive an annual intake in excess of 2 percent of the specified derived air concentration. This is equivalent to 40 DAC-hour exposure in one year and a CEDE of 100 mrems.

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- (2) Require that continuous air monitors (CAMs) be used {10 CFR 835.403(a)(2)} in normally occupied areas where an individual is likely to be exposed to an airborne radioactivity concentration in excess of the DAC, as specified in Appendix A of Part 835, and where the need exists to alert individuals to unexpected increases in airborne radioactivity levels.
  - (3) Be able to demonstrate that the sampling technique in use is capable of detecting and evaluating the level or concentration of airborne DOE radioactive material at work locations, as required by 10 CFR 835.403(a)(1). Naturally occurring radioactive isotopes, specifically Radon, will be evaluated and discriminated against using formal written guidance provided in the form of a procedure, shift order, work instruction, etc.
  - (4) Use site-specific temporal and spatial averaging techniques in determining the requirements for air monitoring.
  - (5) Make every effort to acquire and analyze air samples using the most representative and accurate techniques available. The method used must be appropriate for the existing environmental conditions and will consider the radioactive material source term(s), the release potential of the source term(s), and the containment or confinement of the source term(s).
  - (6) Evaluate each activity for proper personal protective equipment to ensure adequate protection of workers from contamination and minimize exposures to other hazards.
  - (7) Evaluate the need for containment for outdoor work if the following conditions are exceeded:
    - (a) an individual is likely to be exposed to an airborne radioactivity concentration in excess of the 10% of the DAC, as specified in Appendix A of Part 835,
    - (b) removable contamination levels exceed 10,000 dpm alpha or 100,000 dpm beta.
  - (8) Ensure that Soil Contamination Areas (SCAs) are posted in accordance with the RadCon Manual prior to performing any work in suspect areas. A SCA shall be posted as a Contamination Area or a High Contamination Area when monitoring shows that radioactive material contamination can be transferred from the area at levels greater than those specified for removable contamination as defined by Appendix D of 10 CFR 835 {10 CFR 835.603(e) and (f) and RCM 235.1}. It is not necessary to erect a Radiological Buffer Area or a physical barrier around the boundary of a SCA unless survey results suggest that contamination can be spread outside the area.
  - (9) Adequately address unexpected hazards or conditions during environmental restoration, waste management and decontamination and decommissioning activities. In the event unanticipated hazards or conditions are encountered, the project activities will pause to assess the potential hazard or condition. The potential hazard or condition will be evaluated to determine the severity or significance of the hazard or condition and whether the controls for the project are sufficient to address the hazard or conditions. Notification of key personnel shall be conducted in accordance

with RMRS Instruction 001, "Notification, Response, Investigation, and Reporting of Compliance & Safety Events." Based on this initial evaluation, a determination will be made whether to proceed with controls currently in place, segregate the condition or hazard from the project activity (if it can be done safely), or curtail operations to address the unexpected hazard or condition. Concurrence to proceed down the selected path must be obtained from the RMRS Vice President or their designee.



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