Draft B123
Assessment Results

11/12/97

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	CORE REQUIREMENTS			
1	Verify there are adequate and correct safety procedures.	Shawn	•	
2	Verify compliance with environmental regulatory requirements such as regulations and regulator approved project documents.	Karan	• PAM • Statement of Work for Strip-Out • SEP • PEP • RCRA Closure Plan for 123 • Flushing of Fume Hoods • Administrative Record	**Strip-Out:** CDPH&E's review of the PAM required the development of a PEP which was done, a SAP which was done, the IHSS 148 Remediation Plan is TBD, the RCRA Closure for 123 which was done, the asbestos abatement plan and the demolition plan are TBD. CDPH&E requires that the asbestos abatement plan be submitted to CDPH&E one week prior to implementation for review and the demolition plan be submitted at least two weeks prior to implementation for review and approval. Kent Dorr, KH, has maintained communications with CDPHE and they are aware of the project status. **No asbestos abatement work can be done during the Strip-out phase until the Asbestos Plan is submitted to CDPH&E one week prior to implementation.** KH reviewed the Administrative Record in early October and it appeared to be satisfactory. RMRS is going to verify current status.
3	Verify that <u>any required</u> CAQCC Regulation No. 3 APEN (inventory reporting) documents have been submitted to the CDPHE, Air Pollution Control Division. (Note: If pollutant specific inventory thresholds are not tripped, APENs are not required.)	Carol	-C&PA-AQM letter No. CAP-101-97 addressing technical assessment of planned activities for strip-out and demolition of B123.	**Strip-Out**: Satisfactory--Review of information in technical assessment indicates that emission levels of non-radionuclide air pollutants do not exceed APEN reporting thresholds and radionuclides do not exceed monitoring or approval thresholds.
4	Verify that the RFCA/CERCLA decision documents for	Carol	-PAM	**Strip-Out**: Satisfactory--The PAM

Best Available Copy

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	decommissioning Building 123 include the assessment of radionuclide and non-radionuclide air pollutant emissions. Verify that the required RFCA decision documents include adequate information concerning potential air pollutant emissions and their impacts on public health and the environment for the regulators and the public to make informed decisions during the public comment process.		-C&PA/AQM technical assessment letter/CAP-101-97 -Interview with Ken	information indicates that potential air emissions of radionuclides, dust-particulate, lead, asbestos, and beryllium have been evaluated. Technical assessment letter indicates that all potential air pollutant emissions from strip-out are below CAA reporting and monitoring thresholds (APENs are not required; and 40CFR61 reporting and monitoring are not required). Asbestos is identified as specific ARARs under the CAA for asbestos removal operations, dust-particulate is identified as specific ARAR under demolition, and radionuclides are identified as an issue for soil remediation. However, the strip-out phase should not generate these pollutants.
5	Verify that CAA related ARARS have been identified and project control documents provide for their implementation.	Carol	-PAM -SOW for the asbestos removal phase -Waste Management Plan -Bldg reconnaissance characterization plan	**Strip-Out**: Satisfactory—Asbestos, particulates and radionuclides are identified as ARARs for project. Asbestos and dust-particulate are not an issue for strip out phase; potential radionuclide emissions are below CAA reporting and monitoring thresholds
6	Verify that there is a contingency plan to address un-anticipated hazards that could generate air pollutant emissions and have an adverse impact on public health and the environment. Verify that AQM has been appropriately included in the identified contingency plan	Carol	-PAM -Health and Safety Plan -Project Execution Plan (Rev 4)	**Strip-Out**: Marginal--None of the reviewed documents specifically indicates that C&PA Air Quality Management will be notified if an unanticipated finding or event occurs that adversely alters the original CAA assessment for this project. This probably will not occur during the strip-out phase but is likely to be an issue during demolition and soil remediation when air pollutants will be released to atmosphere and can affect the

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
				public.
7	Verify that Asbestos abatement activities are appropriately documented and meet the regulatory requirements of CAQCC Regulation No. 8 Part B. Verification includes documentation that addresses Regulation No. 8 notification, permit, waste storage, and training requirements.	Shawn		
8	Verify that the mitigation of fugitive dust emissions generated from demolition and decommissioning operations is addressed in a control plan specific for Building 123.	Carol	-SOW for the asbestos removal phase -Subcontractor asbestos abatement plans when received	**Strip-out**: Not applicable to this phase of the project.
9	Verify that the control of ozone depleting substances [chlorofluorocarbons (CFCs)] meets the recovery, inventory, and disposition requirements of CAQCC Regulation No. 15 and EPA 40 CFR 82. Verify that the redeployment of air conditioners or other appliances for reuse is documented and that AQM has been provided transfer information	Carol	Interview with Adam Cordova, Maintenance Operations, DynCorp	**Strip-out**: Satisfactory. Some units have been redeployed, others have been warehoused for future use. All CFCs have been recovered from units that will be wasted.
10	Verify that the use of any fossil fuel-fired combustion equipment (i.e. generators) for alternate power support meets any applicable inventory reporting and permitting requirements of CAQCC Regulation No. 3.	Carol	Interview with Ron Heitland, Project Manager.	**Strip-out**: Satisfactory. Diesel or gasoline fined engine use will be tracked. Project management will coordinate with AQM/Radian staff to ensure operations of units are compliant with CAQCC Reg No. 1 and 3 requirements.
11	Verify that there are no abandoned laboratory wastes/chemicals left in the building, in two flammable storage units located at the southwest corner outside of building 123, and in the cargo containers.	Karan	Verification reqmts: Written statement from project mgt, or existing documentation that contains	**Strip-out:** Satisfactory. All areas have been inspected for waste chemicals and no additional chemicals have been found. **Waste chemicals are stored in a 90 day**

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
			that information, or appropriate authorized individuals written statement. Request visual inspection.	**area in building 123 and must be removed prior to any strip out work in the area (e.g. room) being performed.**

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
12	Verify that the "perchlorate-issue" stemming from the multiple years of use of perchloric acid in building chemical hoods is appropriately addressed thorough utilization of experienced personnel and implementation of controls to prevent an industrial accident. [Perchlorates present a shock sensitive hazards (explosive reaction) and require expert removal. (RMRS detected perchlorates during building hazard characterization activities--at least one hood during the building characterization process)].	Karan/ Shawn	Verification requirements: Provide experienced / trained personnel performing removal of chemical hoods. RMRS lead-safety professional approval for subcontractor performing work. IWCP package (contains characterization data for perchlorates	**Strip-out:** Per Section 5.1.3 of the Flushing Fume Hoods, the HSS is required to submit documented experience in perchloric acid vent system removal. To date have not received. **Project cannot begin without approval of qualified contractor**. Issue raised again through Health and Safety Information on proposed subcontractor has been submitted to KH EMC on 11/10 and will be verified.
13	Verify that waste streams which will be generated during decommissioning and demolition have been accurately identified. Verify that identified waste streams will be dispositioned to K-H list approved off-Site disposal facilities. Waste streams of concern: lead based paint, PCBs in paint and cables, liquids left in pipes, flush from pipes, piping, asbestos.	Karan	Verification requirements: Review B123 hazards characterization report. Review waste characterization report. Review list of disposal facilities. Review subcontractor documents. Reviewed: • PAM • Flushing Procedure for Ducts/Hoods	**Strip-out.** RMRS to provide waste management matrix including waste streams to be generated and management facilities to be used 11/11 for KH review and approval.
14	Verify that modifications and additions to the Building 123 decision document (PAM) have been reviewed for adverse impacts to air quality.	Carol	-No modifications to the PAM have been submitted as of 11/10/97. -Interview with Ted Hopkins.	**Strip-out:** Not applicable.
15	Verify that there is a contingency plan to address unknown hazards.	Shawn	Verification requirements: Review HASP or other documentation which provides this information	

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
16	Verify that the NEPA checklist has been completed.	Karan	Verification requirements: Review NEPA checklist	**Strip out:** Satisfactory. Documentation was submitted to KH for review prior to project commencement. Steve Nesta verified that he had received adequate information to review the project.
17	Verify training and qualification programs for operation and operation support personnel have been established and documented. (Training and qualification program encompasses the range of duties and activities required to be performed.)	Shawn	•	
18	Verify the level of knowledge of operations and operation support personnel is adequate based on interviews of personnel	Shawn		
19	Verify safety documentation is in place that describes the "safety envelope" of the project. The safety documentation should characterize the hazard/risks associated with the project and should identify mitigative measures that protect workers and the public form those hazards/risks. Safety system and system essential to worker and public safety are defined and a system to maintain control over the project.	Shawn & Shannon	•	
20	Verify a process has been established to identify, evaluate, and resolve deficiencies and recommendations made by oversight groups, official review teams, audit organizations, and the operating contractor.	Jill	•	
21	Verify management programs are established, sufficient numbers of qualified personnel are provided, and adequate facilities and equipment are available to ensure operational support services are adequate for safe operations.	Greg	•	
22	Verify that functions, assignment, responsibilities, and reporting relationships are clearly defined, understood, and effectively implemented with line management	Shawn	•	

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	responsibility of control of safety.			
23	Verify a program is established to promote a site-wide culture in which personnel exhibit an awareness of public and worker safety, health, and environmental protection requirements and through their actions, demonstrate a high-priority commitment to comply with these requirements.	Shawn	•	
24	Lessons learned from previous similar projects are adequately addressed.	Shawn	•	
	OPTIONAL			
25	Verify a program is in place to confirm and periodically reconfirm the condition and operability of safety system, including safety related process systems and safety related utility system. This includes examination of records of tests and calibration of safety system and other instruments that monitor limiting conditions of operation or that satisfy Technical Safety requirements. All system are currently operable and in a satisfactory condition.	N/A		
26	Verify that a systematic review of the facility's conformance to applicable DOE Orders has been performed, any nonconformance have been identified, and schedules for gaining compliance have been justified in writing and formally approved, or waivers granted.	Shawn	•	
26	Verify a routing and emergency contingency plan, including program record has been established and implemented.	Shawn & Karan	•	•
27	Verify technical and managerial qualification of those DOE personnel who have been assigned responsibilities for providing direction and guidance to the contractor are adequate.	N/A	•	
28	Verify modifications to the facility have been reviewed for potential impacts on procedures and training and qualification. Procedures have been revised to reflect	N/A	•	

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	these modifications and training had been performed to these revised procedures.			
29	Verify the technical and management qualifications of contractor personnel responsible for conduct of operations are adequate.	Greg	•	
30	Verify a program is in place to confirm and periodically reconfirm the condition and operability of environmental monitoring system when present. All system are currently operable and in satisfactory condition.	Karan	•	**Strip out:** Environmental air monitoring is not required for the strip out portion of the project. **This element needs to be assessed for each phase of the project.**
31	Verify all programs are in place to support certification from a waste repository. This includes having the programs in place, assay equipment certifiable, sampling and analysis program certifiable, quality assurance documents, and program in place, resources available all findings from previous audits and assessments closed out, and any other requirements of the waste repository in place and ready for certification.	Karan	• Off-site Waste Approval Facilities • Waste Certification Oversight Program	**Strip-Out:** Satisfactory. The wastes identified to be generated during strip out are routine. As long as no additional waste streams are generated, approved programs are in place for Kettleman Hill, USA Waste, Nevada Test Site, and Hanford.
	ERE CHECKLIST			
32	Work planning documents/Basis of estimate correctly identified hazards and authorization basis	Shannon	•	
33	A work Authorization Document developed and approved, including any required Baseline Change Proposals, which must be approved before work commences.	Jill	•	
34	Funding approved and allocated.	Jill	•	
35	Characterization performed to determine extent of work.	Karan	• PAM • SEP • PEP • Construction Package • Flushing Procedures for Ducts and Hoods	**Strip-out:** Satisfactory. Note: Any procedures or waste not previously identified in any of the project documents must be raised for review and approval.
36	Training contractor and subcontractor field personnel	Shawn		

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	have documented evidence of required training.			
37	Integrated work Control program work package developed.	Greg		
38	Proposed Action Memorandum (PAM) or equivalent approval by ER, K-H, DOE and EPA/CDPHE: PAM outlines the approach that will be taken and the applicable requirements	Karan	• PAM	**Strip-out:** Satisfactory - Refer to comments under item 2 - Regulatory Compliance
39	Development of Field Implementation Plan or equivalent: further defines the actions described in the PAM.	Karan	• PEP • Flushing Procedures for Ducts and Hoods • Construction Package for B123 Stripout • SAP	**Strip-out:** Satisfactory. Although a Field Implementation Plan was not prepared for this project, the identified plans were that meet the intent of the FIP for the Strip Out portion of the project
40	Health and Safety Plan written and approved: to address the safety and health hazards of each phase of site operation and specify the requirements and procedures for employee protection. This may be incorporated into another document.	Shawn	•	
41	Sampling Analysis Plan (SAP) developed defines the criteria for sampling and analysis of material.	Karan	• SAP	**Strip-out:** Submitted to Analytical Services for their review.
42	Verify radiological survey plans are determined and implemented. Verify that plans are developed from industry recognized standards	Bill	• NUREG/CR-5849 "Manual for conducting Radiological surveys in support of License termination. • Radiation survey and Site Investigation Manual (MARSSIM) • RFETS survey plans and survey results summaries.	

2ND Floor Double doors
North
Jill Bruse

Phase approach
Verify NO additional documents required for strip out

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Assessment Results

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	CORE REQUIREMENTS			
1	Verify there are adequate and correct safety procedures.	Shawn	•Skip Challenger	
2	Verify compliance with environmental regulatory requirements such as regulations and regulator approved project documents.	Karan	• PAM • Statement of Work for Strip-Out • SEP • PEP • RCRA Closure Plan for 123 • Flushing of Fume Hoods	**Strip-Out:** CDPH&E's review of the PAM required the development of a PEP which was done, a SAP which was done, the IHSS 148 Remediation Plan ___, the RCRA Closure for 123 which was done, the asbestos abatement plan ____and the demolition plan____. CDPH&E requires that the asbestos abatement plan be submitted to CDPH&E one week prior to implementation for review and the demolition plan be submitted at least two weeks prior to implementation for review and approval.
3	Verify that <u>any required</u> CAQCC Regulation No. 3 APEN (inventory reporting) documents have been submitted to the CDPHE, Air Pollution Control Division. (Note: If pollutant specific inventory thresholds are not tripped, APENs are not required.)	Carol	-C&PA-AQM letter No. CAP-101-97 addressing technical assessment of planned activities for strip-out and demolition of B123.	**Strip-Out**: Satisfactory--Review of information in technical assessment indicates that emission levels of non-radionuclide air pollutants do not exceed APEN reporting thresholds and radionuclides do not exceed monitoring or approval thresholds.
4	Verify that the RFCA/CERCLA decision documents for decommissioning Building 123 include the assessment of radionuclide and non-radionuclide air pollutant emissions. Verify that the required RFCA decision documents include adequate information concerning potential air pollutant emissions and their impacts on public health and the environment for the regulators and the public to make informed decisions during the public comment process.	Carol	-PAM -C&PA/AQM technical assessment letter/CAP-101-97 -Interview with Ken	**Strip-Out**: Satisfactory--The PAM information indicates that potential air emissions of radionuclides, dust-particulate, lead, asbestos, and beryllium have been evaluated. Technical assessment letter indicates that all potential air pollutant emissions from strip-out are below CAA reporting and monitoring thresholds (APENs are not required; and 40CFR61 reporting and monitoring are not required). Asbestos is

1 48/121 SAP

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
				identified as specific ARARs under the CAA for asbestos removal operations, dust-particulate is identified as specific ARAR under demolition, and radionuclides are identified as an issue for soil remediation. However, the strip-out phase should not generate these pollutants.
5	Verify that CAA related ARARS have been identified and project control documents provide for their implementation.	Carol	-PAM -SOW for the asbestos removal phase -Waste Management Plan -Bldg reconnaissance characterization plan	**Strip-Out**: Satisfactory—Asbestos, particulates and radionuclides are identified as ARARs for project. Asbestos and dust-particulate are not an issue for strip out phase; potential radionuclide emissions are below CAA reporting and monitoring thresholds
6	Verify that there is a contingency plan to address un-anticipated hazards that could generate air pollutant emissions and have an adverse impact on public health and the environment. Verify that AQM has been appropriately included in the identified contingency plan No contingency Amend contingency Plan / Health Safety Plan - to notify K-H EMC of unanticipated hazards	Carol	-PAM -Health and Safety Plan -Project Execution Plan (Rev 4)	**Strip-Out**: Marginal--None of the reviewed documents specifically indicates that C&PA Air Quality Management will be notified if an unanticipated finding or event occurs that adversely alters the original CAA assessment for this project. This probably will not occur during the strip-out phase but is likely to be an issue during demolition and soil remediation when air pollutants will be released to atmosphere and can affect the public.
7	Verify that Asbestos abatement activities are appropriately documented and meet the regulatory requirements of CAQCC Regulation No. 8 Part B. Verification includes documentation that addresses Regulation No. 8 notification, permit, waste storage, and training requirements.	Shawn		

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
8	Verify that the mitigation of fugitive dust emissions generated from demolition and decommissioning operations is addressed in a control plan specific for Building 123.	Carol	-SOW for the asbestos removal phase -Subcontractor asbestos abatement plans when received	**Strip-out**: Not applicable to this phase of the project.
9	Verify that the control of ozone depleting substances [chlorofluorocarbons (CFCs)] meets the recovery, inventory, and disposition requirements of CAQCC Regulation No. 15 and EPA 40 CFR 82. Verify that the redeployment of air conditioners or other appliances for reuse is documented and that AQM has been provided transfer information	Carol	Interview with Adam Cordova, Maintenance Operations, DynCorp	**Strip-out**: Satisfactory. Some units have been redeployed, others have been warehoused for future use. All CFCs have been recovered from units that will be wasted.
10	Verify that the use of any fossil fuel-fired combustion equipment (i.e. generators) for alternate power support meets any applicable inventory reporting and permitting requirements of CAQCC Regulation No. 3.	Carol	Interview with Ron Heitland, Project Manager.	**Strip-out**: Satisfactory. Diesel or gasoline fined engine use will be tracked. Project management will coordinate with AQM/Radian staff to ensure operations of units are compliant with CAQCC Reg No. 1 and 3 requirements.
11	Verify that there are no abandoned laboratory wastes/chemicals left in the building, in two flammable storage units located at the southwest corner outside of building 123, and in the cargo containers.	Karan	<u>Verification reqmts:</u> Written statement from project mgt, or existing documentation that contains that information, or appropriate authorized individuals written statement. Request visual inspection.	**Strip-out:** Satisfactory. All areas have been inspected for waste chemicals and no additional chemicals have been found. Waste chemicals are stored in a 90 day area in building 123 and must be removed prior to any strip out work in the area being performed. **Still need written statement from project management.**

chemical removed or verification removed before work.

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Jill
Qualification approved by Shawn

Item	Checklist	Assign'mt	Supporting Documentation	Results
12	Verify that the "perchlorate-issue" stemming from the multiple years of use of perchloric acid in building chemical hoods is appropriately addressed thorough utilization of experienced personnel and implementation of controls to prevent an industrial accident. [Perchlorates present a shock sensitive hazards (explosive reaction) and require expert removal. (RMRS detected perchlorates during building hazard characterization activities--at least one hood during the building characterization process)].	Karan/ Shawn	Verification requirements: Provide experienced / trained personnel performing removal of chemical hoods. RMRS lead-safety professional approval for subcontractor performing work. IWCP package (contains characterization data for perchlorates	**Strip-out:** Per Section 5.1.3 of the Flushing Fume Hoods, the HSS is required to submit documented experience in perchloric acid vent system removal. To date have not received. **Project cannot begin without approval of qualified contractor**. Issue raised again through Health and Safety
13	Verify that waste streams which will be generated during decommissioning and demolition have been accurately identified. Verify that identified waste streams will be dispositioned to K-H list approved off-Site disposal facilities. Waste streams of concern: lead based paint, PCBs in paint and cables, liquids left in pipes, flush from pipes, piping, asbestos. Strip out Asbestos Abatement Demo Soils - IHSS	Karan	Verification requirements: Review B123 hazards characterization report. Review waste characterization report. Review list of disposal facilities. Review subcontractor documents. Reviewed: • PAM • Flushing Procecedure for Ducts/Hoods	**Strip-out:**. Satisfactory: The Project Description and Waste Management section of PAM outlines anticipated wastes to be generated and ultimate management. These are all acceptable. **NOTE: Any new waste streams generated or deviation for additions to management facilities identified in Section 3.1.3 must be approved by KH. Revision of the PAM must be reviewed.** Weak. Section 2.4.7 of the PAM states that no potential PCB contaminated systems, including paint has been identified. Documentation could not be found to support this statement. Also facility to manage TSCA regulated lamps is not included in PAM. Recommend the lamps be placed into Site generated waste and managed appropriately.
14	Verify that modifications and additions to the Building	Carol	Documents have PEP Soil	

#2 Phased approach
Letter cover letter (8/25/97)
Two submitted, not applicable

WMP →

No paint during strip out
Tubes - Yes

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Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	123 decision document (PAM) have been reviewed for adverse impacts to air quality.			
15	Verify that there is a contingency plan to address unknown hazards.	Shawn	Verification requirements: Review HASP or other documentation which provides this information	
16	Verify that the NEPA checklist has been completed.	Karan	Verification requirements: Review NEPA checklist	**Strip out:** Satisfactory. Documentation was submitted to KH for review prior to project commencement.
17	Verify training and qualification programs for operation and operation support personnel have been established and documented. (Training and qualification program encompasses the range of duties and activities required to be performed.)	Shawn	•	
18	Verify the level of knowledge of operations and operation support personnel is adequate based on interviews of personnel	Shawn		

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
19	Verify safety documentation is in place that describes the "safety envelope" of the project. The safety documentation should characterize the hazard/risks associated with the project and should identify mitigative measures that protect workers and the public form those hazards/risks. Safety system and system essential to worker and public safety are defined and a system to maintain control over the project.	Shawn & Shannon	•	
20	Verify a process has been established to identify, evaluate, and resolve deficiencies and recommendations made by oversight groups, official review teams, audit organizations, and the operating contractor.	Jill	•	
21	Verify management programs are established, sufficient numbers of qualified personnel are provided, and adequate facilities and equipment are available to ensure operational support services are adequate for safe operations.	Greg	•	
22	Verify that functions, assignment, responsibilities, and reporting relationships are clearly defined, understood, and effectively implemented with line management responsibility of control of safety.	Shawn	•	

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
23	Verify a program is established to promote a site-wide culture in which personnel exhibit an awareness of public and worker safety, health, and environmental protection requirements and through their actions, demonstrate a high-priority commitment to comply with these requirements.	Shawn	•	
24	Lessons learned from previous similar projects are adequately addressed.	Shawn	•	
	OPTIONAL			
25	Verify a program is in place to confirm and periodically reconfirm the condition and operability of safety system, including safety related process systems and safety related utility system. This includes examination of records of tests and calibration of safety system and other instruments that monitor limiting conditions of operation or that satisfy Technical Safety requirements. All system are currently operable and in a satisfactory condition.	N/A		
26	Verify that a systematic review of the facility's conformance to applicable DOE Orders has been performed, any nonconformance have been identified, and schedules for gaining compliance have been justified in writing and formally approved, or waivers granted.	Shawn	•	
26	Verify a routing and emergency contingency plan, including program record has been established and implemented.	Shawn & Karan	•	•
27	Verify technical and managerial qualification of those DOE personnel who have been assigned responsibilities for providing direction and guidance to the contractor are adequate.	N/A	•	
28	Verify modifications to the facility have been reviewed for potential impacts on procedures and training and	N/A	•	

Item	*Checklist*	*Assign'mt*	*Supporting Documentation*	*Results*
	qualification. Procedures have been revised to reflect these modifications and training had been performed to these revised procedures.			
29	Verify the technical and management qualifications of contractor personnel responsible for conduct of operations are adequate.	Greg	•	
30	Verify a program is in place to confirm and periodically reconfirm the condition and operability of environmental monitoring system when present. All system are currently operable and in satisfactory condition.	Karan	•	• CAROL - IS ANY AIR MONITORING REQUIRED? I CAN'T THINK OF ANY OTHER MONITORING REQD
31	Verify all programs are in place to support certification from a waste repository. This includes having the programs in place, assay equipment certifiable, sampling and analysis program certifiable, quality assurance documents, and program in place, resources available all findings from previous audits and assessments closed out, and any other requirements of the waste repository in place and ready for certification.	Karan	• Off-site Waste Approval Facilities • Waste Certification Oversight Program	**Strip-Out:** Satisfactory. The wastes identified to be generated during strip out are routine. As long as no additional waste streams are generated, approved programs are in place for Kettleman Hill, USA Waste, Nevada Test Site, and Hanford.
	ERE CHECKLIST			
32	Work planning documents/Basis of estimate correctly identified hazards and authorization basis	Shannon	•	
33	A work Authorization Document developed and approved, including any required Baseline Change Proposals, which must be approved before work commences.	Jill	•	
34	Funding approved and allocated.	Jill	•	
35	Characterization performed to determine extent of work.	Karan	• PAM • SEP • PEP • Construction Package • Flushing Procedures for Ducts and Hoods	**Strip-out:** Satisfactory. Note: Any procedures or waste not previously identified in any of the project documents must be raised for review and approval.

NA for strip out

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Item	Checklist	Assign'mt	Supporting Documentation	Results
36	Training contractor and subcontractor field personnel have documented evidence of required training.	Shawn		
37	Integrated work Control program work package developed.	Greg		
38	Proposed Action Memorandum (PAM) or equivalent approval by ER, K-H, DOE and EPA/CDPHE: PAM outlines the approach that will be taken and the applicable requirements	Karan	• PAM	**Strip-out:** Satisfactory - Refer to comments under item 2 - Regulatory Compliance Phased Approach
39	Development of Field Implementation Plan or equivalent: further defines the actions described in the PAM.	Karan	• PEP • Flushing Procedures for Ducts and Hoods • Construction Package for B123 Stripout • SAP	**Strip-out:** Satisfactory. Although a Field Implementation Plan was not prepared for this project, the identified plans were that meet the intent of the FIP for the Strip Out portion of the project
40	Health and Safety Plan written and approved: to address the safety and health hazards of each phase of site operation and specify the requirements and procedures for employee protection. This may be incorporated into another document.	Shawn	•	
41	Sampling Analysis Plan (SAP) developed defines the criteria for sampling and analysis of material.	Karan	• SAP	**Strip-out:** Perchloric
42	Verify radiological survey plans are determined and implemented. Verify that plans are developed from industry recognized standards	Bill	• NUREG/CR-5849 "Manual for conducting Radiological surveys in support of License termination. • Radiation survey and Site Investigation Manual (MARSSIM) • RFETS survey plans and survey results summaries.	

Strip out phase

Eileen H — Sims

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