

10CFR851 Issues

EFCOG Price-Anderson Working
Group 4/26/06 Meeting

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- Spent a full day going over 851 (section by section) and identifying issues, comments, possible approaches
- About 90 participants (including EH-6)
- Full set of notes are on the EFCOG website

Summary – Major Issues

- Scope – Worker Applicability/OSHA-Regulated
 - Contractors working off-site at DOE leased facilities
 - Contractors working off-site on non-DOE mission activities (e.g., DOD, DHS, etc.)
 - Service subcontractors working on-site (e.g., landscapers, cafeteria workers, etc.)
 - Vendors that deliver, unload, and install or set-up equipment
 - Individuals with access through a contractor working on-site associated with non-DOE missions

Summary – Major Issues (cont)

- Design Related Codes & Standards
 - Existing facilities do not meet the specified versions (e.g., NFPA 70 and ASME) ... are baselines required to identify deviations
- Processes to Deal with Deviations ... when's and what's
 - Variances
 - Approvals by AHJs
 - Approvals by other processes
 - Disposition/approval of de minimis

Summary – Major Issues (cont)

- Workplace Hazard Baselines ... are they required for ALL facilities/activities (versus those that are likely to have hazards)
- Occupational Medicine
 - Extent of applicability of all aspects to subcontractors
 - Aspects become unclear when the medical service is subcontracted