

## 9.0 PROJECT MANAGEMENT AND ORGANIZATION

MDNR has contracted with MACTEC, a decommissioning contractor, to perform the decommissioning tasks identified in Section 8.0 at the Tobico Marsh SGA site. The decommissioning contractor has the responsibility to complete the identified tasks in a safe manner and in compliance with approved procedures, plans, and the terms and conditions specified in MDNR's radioactive materials license (NRC 1999a) and this DP. All radiological work to be performed in support of the decommissioning of the site will be performed under the authority of MDNR's radioactive materials license and the approved DP. MDNR retains overall responsibility for compliance with the terms and conditions specified in the radioactive materials license and this DP.

### 9.1 DECOMMISSIONING MANAGEMENT ORGANIZATION

The limited scope of the proposed decommissioning activities require a relatively small, multidisciplined project management organization. Figure 9-1 shows the functional decommissioning project organization including the relationships between the MDNR organizational unit and those of MACTEC. The functional organization for the completion of decommissioning activities includes one organizational unit that has the overall responsibility to manage and oversee the project for the MDNR. There are three organizational units identified within the contractor's management organization: 1) project management; 2) site management; and 3) engineering and support. The MDNR's decommissioning organizational unit is responsible for directing the contractor's project management organization to accomplish the various tasks leading to decommissioning and license termination for the site. The unit also has the responsibility to fund decommissioning activities, oversee the contractor organization activities, communicate with the NRC (as appropriate or required) and speak on behalf of the State and MDNR. MDNR is responsible for providing a project radiation safety officer (RSO).

The contractor's project-management organizational unit is responsible for implementing the approved decommissioning activity plans and procedures in accordance with the applicable laws and regulations governing the license termination process at the site. It is responsible for the safe implementation of all assigned tasks -- communicating to the MDNR any changes in circumstances that have the potential to affect the completion of the decommissioning tasks as approved or within the overall timeframe permitted. The unit also responsible for allocating the appropriate resources necessary to accomplish the approved decommissioning tasks, providing the requisite training, and assuring the quality of work performed under its direction.

The contractor's site operations organizational unit is responsible for day-to-day performance of the field operations associated with the approved decommissioning tasks outlined in this DP and MDNR's radioactive materials license. It is responsible to oversee the decommissioning work performed by subcontractors at the site. It is responsible to ensure that all work performed is appropriately authorized and follows the

approved procedures, plans, policies, and permits governing such work. It is responsible to verify that workers satisfy the requisite training requirements, and to appropriately document the work activities, site safety briefings, and radiological surveys performed in support of the decommissioning tasks.

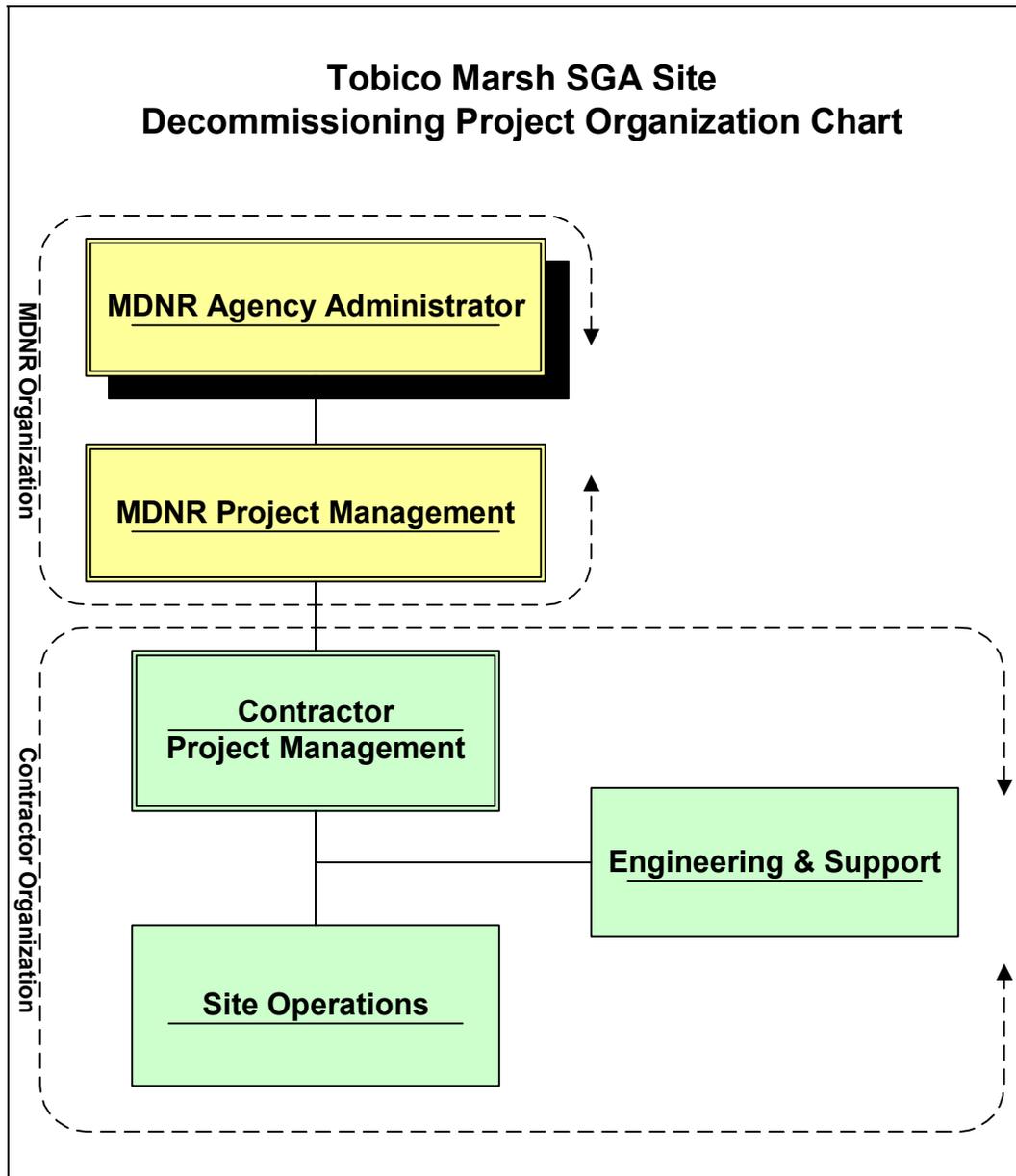


Figure 9–1 Decommissioning Management Organization

The contractor’s engineering and support organizational unit is responsible to advise the MDNR’s and contractor’s project management organizations on matters relevant to the implementation of the site’s radiation protection and radiological control program during

decommissioning. The radiological engineering and support organization is also responsible to oversee the implementation of the radiation protection program, to assess the radiological conditions encountered during the course of decommissioning activities, to initiate control measures, as necessary, and to ensure that site operations remain within the design basis of approved plans, procedures, and permits. It is also responsible to approve radiological work permits used to perform tasks requiring specific radiological control measures. It further has the responsibility to oversee the performance and assess the results of radiological surveys used to determine whether the approved decontamination limits or site-specific DCGLs have been met.

As represented in Figure 9–1, the reporting hierarchy is relatively simple. The contractor’s site operations and radiological engineering and support organizational units both report to the contractor’s project management organizational unit, which in turn reports directly to the MDNR’s project management. In certain circumstances, such as emergencies or unexpected, serious radiological conditions, both the contractor’s site operations and engineering and support organizational units may provide information immediately and directly to MDNR’s project management organizational unit.

Each of the four decommissioning management organizational units has the responsibility and the authority to ensure that its decommissioning activities are conducted in a safe manner and in accordance with approved written procedures. The contractor’s Quality Assurance (QA) Specialist will provide independent verification that the contractor’s procedures are followed.

## **9.2 DECOMMISSIONING TASK MANAGEMENT**

Decommissioning tasks and activities involving licensed material or the potential for workers to receive a dose that requires personnel monitoring or radiological posting will be conducted in accordance with approved, written procedures, detailed written work plans, or radiation work permits (RWP).

Written procedures involving licensed materials will be approved by the site RSO and QA Specialist prior to implementation. RWPs will be approved by the RSO or his/her designated authority. RWPs are managed in accordance with an approved written procedure. The RWP procedure addresses request, initiation, development, issuance, and termination of an RWP. The RWP will normally be requested by the work group supervisor of a particular activity. The request will include a description of the activity to be performed and will identify intended authorized users of the RWP. The contractor’s project management organization together with the contractor’s radiological engineering and support organization will jointly assess the scope of work that has been requested to be permitted, considering available alternatives to the proposed method, the existing and anticipated radiological conditions that might be encountered, and other non-radiological hazards that might be attendant with a given approach. After evaluating these aspects, the radiological engineering and support organization will concur with the selected approach and prescribe the radiological work controls to be emplaced.

After the RWP is completed and approved by the RSO (or his/her designee), it is issued to the work group supervisor(s) of the authorized users. During use, a copy of the approved RWP is maintained at the worksite, and authorized users are required to sign-in/out when participating in the subject activity, indicating their understanding of the radiological control requirements specified in the RWP. The RWP is terminated upon completion of the subject activity. If radiological conditions or requirements change, a new or revised RWP will be issued.

When the decommissioning tasks for which they were written and approved are completed, RWPs will be filed with the MDNR, together with their associated RWP request form, access control logs, radiological surveys, and other documents pertinent to the task permitted.

At daily onsite safety meetings, workers will be apprised of the addition of newly approved RWPs and revisions to previously approved RWPs. Workers identified as authorized users will be briefed on the controls, requirements, and limitations imposed by the RWP as well as the radiological conditions associated with the approved task before work begins. Individual workers are required to review the RWP each time they use the RWP to perform an assigned task.

### **9.3 DECOMMISSIONING MANAGEMENT POSITIONS AND QUALIFICATIONS**

#### *9.3.1 MDNR Agency Administrator*

The MDNR Agency Administrator is the State's senior project administrator. Within the State of Michigan, the MDNR Agency Administrator has the authority and responsibility to commit agency resources and to communicate and act on behalf of the State. The Agency Administrator essentially serves as the interface between the political element of the State's government and the MDNR staff assigned to decommission the Tobico Marsh SGA site. The MDNR Agency Administrator has appointed an MDNR Project Manager to oversee the day-to-day operation and management of the MDNR decommissioning project and to ensure conformance with the terms and conditions of the MDNR's radioactive materials license.

The MDNR Agency Administrator reports to the MDNR Director. The Agency Administrator is a senior level manager within the MDNR, having a minimum 15 years of experience, at least 5 years of which will be in a program or project management role.

Ms. Kelli Sobel serves as the current MDNR Agency Administrator. She has 19 years of experience in state government agencies managing financial and environmental resources, the last 8 years of which she has served in senior agency management positions.

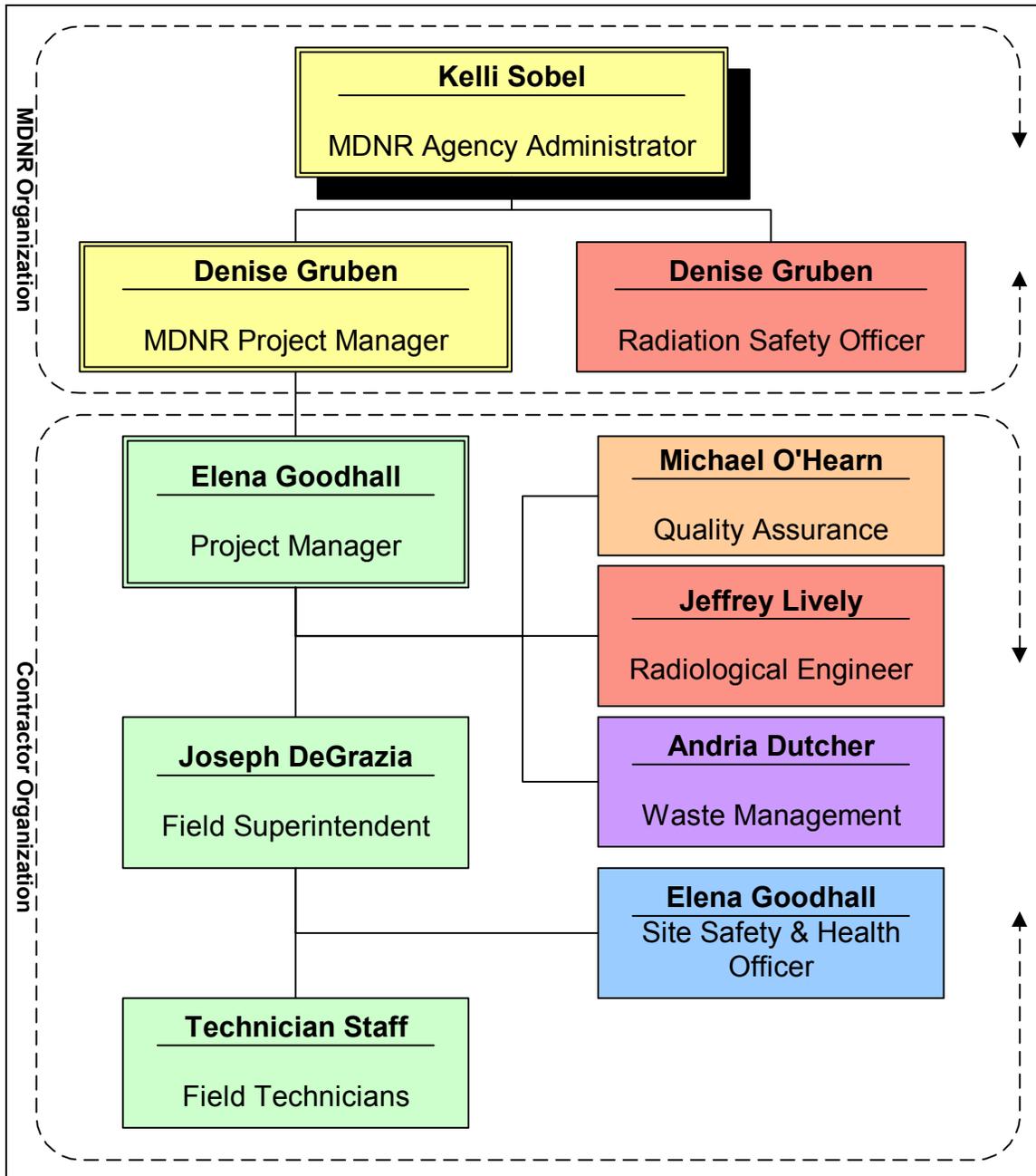


Figure 9–2 Decommissioning Management Positions

### 9.3.2 MDNR Project Manager

The MDNR Project Manager (PM) has the overall responsibility for management of the MDNR's radioactive materials license, directing the contractor organization to accomplish approved decommissioning tasks, and the safe conduct of the project in compliance with the applicable laws, regulations, and permit requirements. This

individual provides the senior project management oversight for implementation and execution of the project decommissioning plan including scheduling, funding, and overall task management. The MDNR PM is also responsible for implementing the decommissioning project in accordance with the project-specific radiological health and safety program, project quality specifications, and applicable worker safety and environmental protection regulations. The MDNR Project Manager has further assigned these responsibilities to the Contractor's Project Manager, Site Safety & Health Officer, and the Quality Assurance Manager.

The MDNR Project Manager will hold a degree in science or engineering or have equivalent knowledge, and will have a minimum 15 years of experience, at least 5 years of which will be in a project management role.

Ms. Denise Gruben has served as the MDNR's PM for the Tobico Marsh SGA site for the past 9 years and continues to serve in that capacity. She has 19 years of experience managing and supervising environmental programs and projects for the State of Michigan. Ms. Gruben holds bachelor's and master's degrees in the fields of environmental science.

### 9.3.3 *Radiation Safety Officer*

As the responsible party and licensee, MDNR retains responsibility for the appointment of a radiation safety officer for the NRC issued radioactive materials license No. SUC-1581 (NRC 1999a). The RSO has the specific authority and responsibility to implement and manage the Radiation Protection Program during decommissioning.

The RSO is responsible for the overall content and implementation of the Radiation Protection Program (RPP) during decommissioning (Section 10.0). The RSO provides direction and guidance on, and is responsible for the development, maintenance, oversight and implementation of radiation protection programs and procedures specific to the site or project. As part of this responsibility, the RSO, or duly authorized representative, will review the radiation safety program annually and document the review. The RSO will ensure that the plans, processes, and procedures implemented on the project are consistent with the MDNR's commitment to the As Low As Reasonably Achievable (ALARA) philosophy and stated ALARA goals.

The RSO is also responsible for directing the radiological staff. If the RSO, or duly authorized representative, believes an operation to be unsafe, he or she has the responsibility and authority to halt that operation until the operation has been deemed safe. The RSO has overall responsibility for assuring that work on the Tobico Marsh Site is conducted in accordance with the RPP during decommissioning. The RSO is responsible for communication and information exchange with the NRC. The RSO has primary responsibility for the technical adequacy and correctness of the RPP.

The RSO may designate and authorize an appropriately qualified representative to perform some or all of the RSO functions described in the license definition of an RSO.

However, the RSO retains responsibility for ensuring that these functions are implemented as required.

The requisite qualifications for the RSO are a bachelor's degree in sciences or engineering with at least 3 years of experience working with radioactive materials under licensed authority (or in lieu of a degree, at least 10 years of experience working with radioactive material and managing radiation protection programs).

Ms. Denise Gruben has served as RSO for the Tobico Marsh SGA site for 6 years and continues to serve in that capacity. She has 19 years of experience managing and supervising environmental programs and projects for the State of Michigan and 9 years of PM experience with the Tobico Marsh SGA site for the MDNR. Ms. Gruben holds bachelor's and master's degrees in the fields of environmental science.

#### *9.3.4 Contractor Project Manager*

The contractor's project manager (CPM) is responsible for implementing the approved decommissioning activity plans and procedures in accordance with the applicable laws and regulations governing the license termination process at the site. The CPM is responsible for the safe implementation of all assigned tasks, communicating any changes in circumstances that have the potential to affect the completion of the decommissioning tasks as approved or within the overall timeframe permitted to the MDNR PM. The CPM is also responsible for allocating the appropriate resources necessary to accomplish the approved decommissioning tasks, providing the requisite training, and assuring the quality of work performed under his/her direction.

The CPM will hold a degree in a science or engineering field (or have equivalent knowledge) and will have a minimum 6 years of experience in environmental site remediation, at least 3 years of which will be in a supervisory or management role.

Ms. Elena Goodhall has over 10 years of experience in environmental site remediation and has served in a supervisory role on the Tobico Marsh SGA site for the past 4 years. She has 8 years of experience managing and supervising activities at sites undergoing environmental assessment or remediation. She was appointed to be the CPM in October 2003 and continues to serve in that capacity. Ms. Goodhall holds bachelor's and master's degrees in the fields of engineering and hazardous waste management.

#### *9.3.5 Field Superintendent*

The contractor's Field Superintendent is responsible for all operational aspects of decommissioning project performance, including the day-to-day performance of the field operations associated with the approved decommissioning tasks outlined in this DP and MDNR's radioactive materials license. This individual is responsible for implementation and oversight of the planned and scheduled decommissioning activities described in Section 8.0. The field superintendent consults with engineering and support organization personnel including waste management, quality assurance, site safety and health, and

radiological engineering personnel to ensure that the decommissioning project's programs, plans, and procedures are appropriately and safely implemented in the field. This individual is responsible to ensure that all work performed is appropriately authorized and follows the approved procedures, plans, policies, and permits governing such work. He or she has the responsibility and authority to immediately stop any work activity that is judged unsafe or that might result in a violation of the applicable laws and regulations governing the decommissioning activities at the site. He or she provides direct supervisory oversight of the technician, laborer, and subcontracted services workforce and is responsible to verify that workers satisfy the requisite training requirements, and to appropriately document the work activities, site safety briefings, and radiological surveys performed in support of the decommissioning tasks.

The contractor's Field Superintendent will have a minimum 5 years of experience in environmental site remediation, at least 2 years of which will be in a supervisory or management role.

Mr. Joseph DeGrazia has 7 years of experience in environmental site remediation and has served in a supervisory role on the Tobico Marsh SGA site for the past 4 years. He has 5 years of experience managing and supervising activities at sites undergoing environmental assessment or remediation. He has served in the capacity of the project Field Superintendent on the Tobico Marsh SGA site decommissioning project over the past 4 years and continues to serve in that capacity. Mr. DeGrazia holds a bachelor's degree in the field of geology.

### 9.3.6 *Site Safety & Health Officer*

The Site Safety & Health Officer (SHO) is responsible for the day-to-day implementation and oversight of onsite safety and health requirements including appropriate implementation of radiological health and safety, and regulatory compliance.<sup>1</sup> The SHO has the responsibility and authority to immediately stop any work activity that is judged unsafe or that might result in a violation of the applicable laws and regulations governing the decommissioning activities at the site. The SHO will consult with and advise the project Field Superintendent regarding the safe conduct of work activities at the site. The SHO will perform routine safety inspections to ensure compliance with applicable regulatory requirements, review and validate analytical and air monitoring data, and perform monthly and quarterly self-assessments. In addition, the SHO will develop, implement, and maintain a training matrix for personnel assigned to the project and ensure that required qualifications are maintained current through timely notification of training requirements and scheduled training to the contractor's Field Superintendent. The SHO will keep the RSO informed of issues related to the radiological status of the site and activities performed at the site.

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<sup>1</sup> The Site Safety and Health Officer will have professional level health physics support (as necessary) to assure the proper implementation of the RPP for decommissioning activities and the safe conduct of work involving radioactive materials at the site.

The requisite qualifications for the project SHO is a minimum 5 years of experience in areas such as construction safety, environmental worksite worker safety, radiation safety, radiation monitoring, emergency preparedness, industrial safety, and personnel exposure monitoring and evaluation. The SHO will have the ability to recognize potential physical, radiation, and chemical safety problem areas in operations and to advise workers and responsible line management personnel regarding appropriate and compliant control measures. The SHO will be capable of directing the surveillance activities of the Health Physics Technicians.

Ms. Elena Goodhall is designated as the project SHO. She has over 10 years of experience in environmental site remediation work during which she has served as the onsite safety and health officer. She has served in a supervisory role on the Tobico Marsh SGA site for the past 4 years. Her experience with radiological safety and health compliance is limited, but given the scope of the work yet to be performed, it is not expected that radiological hazards that could challenge the safety of workers on the site, or affect regulatory compliance will be encountered.<sup>2</sup> Ms. Goodhall holds bachelor's and master's degrees in the fields of engineering and hazardous waste management.

#### *9.3.7 Project Quality Assurance Specialist*

The project Quality Assurance Specialist is responsible for the implementation and execution of quality assurance (QA) and quality control (QC) procedures and practices used in the performance of decommissioning tasks. His responsibilities include supervision of the project's document control practices and procedures as well as the appropriate documentation of quality of work having specific quality requirements or specifications. This individual is also responsible for preparation, implementation, and oversight of audits, assessments, inspections, and surveillances performed in support of the decommissioning project. The QA Specialist is responsible for the documenting, tracking, and disposition of project related deficiencies as well as managing a system to track and implement corrective actions.

The project Quality Assurance Specialist will hold a degree in science or engineering and have a minimum of 5 years experience in management, with a minimum of 2 years experience in oversight and responsibility for quality assurance and quality control issues.

Mr. Michael O'Hearn is the project Quality Assurance Specialist. He has 22 years of experience in environmental site remediation project management with 14 years of experience in oversight and responsibility for quality assurance and quality control issues. In the 1990s, he participated in some phases of the scoping survey at the Tobico SGA Site as ABB Environmental Services program manager for the State of Michigan Contracts. Mr. O'Hearn holds bachelor's degree in the field of environmental engineering.

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<sup>2</sup> In the unlikely event that unexpected and serious radiological conditions are encountered during the conduct of the remaining decommissioning activities or if unencapsulated radioactive materials must be handled, the contractor will provide an additional onsite SHO having the specialized qualifications needed to assure the appropriate level of radiological safety and health oversight is afforded.

### *9.3.8 Radiological Engineer*

The project Radiological Engineer provides technical expertise and consults with the project's RSO, CPM, Field Superintendent, and SHO. The Radiological Engineer is responsible for the preparation of procedures and instructions that implement the RPP during decommissioning, as necessary, to maintain compliance with the terms and conditions in MDNR's radioactive materials license, the approved DP, and applicable regulations. The duties of the Radiological Engineer include technical assistance and guidance to the entire decommissioning organization, as required.

The radiological engineer will concur with all procedures, plans, and permits (or modifications to such) having implications to the use of radioactive materials, exposure to radiation, or compliance with the terms and conditions in MDNR's radioactive materials license, the approved DP, and applicable regulations governing the possession and use of radioactive material.

The requisite qualifications for the radiological engineer are a bachelor's degree in a science or engineering field with at least 3 years of experience working with radioactive materials under licensed authority (or in lieu of a degree, at least 10 years of experience working with radioactive material and managing radiation protection programs).

Mr. Jeffrey Lively serves as the project radiological engineer. He has over 25 years of experience in the nuclear field and working with radioactive materials, the last 12 years of which he has supervised or managed radiation protection programs in support of radiological and environmental remediation projects. He is a Certified Safety Professional and a Registered Radiation Protection Technologist.

### *9.3.9 Waste Management Specialist*

The Waste Management Specialist (WMS) provides technical expertise and consults with the project's RSO, CPM, Field Superintendent, and SHO on matters regarding waste characterization and classification. The WMS is responsible for the preparation of procedures and instructions that direct the handling, storage, packaging, and disposal of wastes generated at the site during the performance of decommissioning activities, as applicable. In addition, the WMS is responsible to ensure that wastes are offered for disposal only to appropriately licensed facilities and that wastes offered for shipment or disposal have been appropriately characterized. The WMS will certify that the applicable waste acceptance criteria (as provided by the disposal facility) have been met. The duties of the WMS include technical assistance and guidance to the entire decommissioning organization, as required.

The requisite qualifications for the Waste Management Specialist are a bachelor's degree in a science or engineering field with at least 3 years of experience working with radioactive, hazardous, and mixed wastes (or in lieu of a degree, at least 10 years of experience working with radioactive, hazardous, and mixed wastes and overseeing waste management programs involving radioactive materials).

Ms. Andria Dutcher serves as the project WMS. She has 15 years of experience working with radioactive, hazardous, and mixed wastes, the last 8 years of which she supervised or managed the Environment, Safety, Health, and Waste Management programs in support of radiological and environmental remediation projects. Ms. Dutcher is a Certified Hazardous Materials Manager, Registered Environmental Manager, and holds a master's degrees in the field of environmental science.

### *9.3.10 Radiation Safety Committee*

The Radiation Safety Committee (RSC) is, at minimum, a three-member committee comprised of the RSO, the contractor project manager, and the project radiological engineer. The committee reviews abnormal occurrences, reports of audits, inspections, and surveillances, and ensures that adverse observations or results are resolved.

Because of the limited nature of the decommissioning tasks to be performed and the low exposure conditions anticipated in their performance, MDNR does not plan to form a separate ALARA committee. This is not to say that MDNR is not committed to the ALARA principle. In fact, MDNR is firmly committed to maintaining radiation exposures ALARA. The RSC will establish ALARA goal(s) for the project commensurate with the radiological hazards anticipated and the scope of the tasks to be performed.

The RSO is primarily responsible for maintaining the ALARA program and updating management and the RSC on any problems or concerns dealing with the overall health and safety of workers. The RSO will ensure completion of an annual review of the records of workers' exposures to verify that exposures remain ALARA. The RSC will consider the findings and recommendations of the RSO's ALARA review.

## **9.4 TRAINING**

A radiological protection (RP) training program for MDNR employees, contractors, subcontractors, and visitors requiring access to the radiologically impacted and controlled areas of the site has been established and is in operation. The RP training program is designed to provide workers and visitors at the site with a fundamental knowledge and understanding of the relative hazards associated with radioactivity present at the site including the awareness issues outlined in 10 CFR Parts 19, 20, 40, and 71. It also provides more specific information on the potential radiological hazards and the requisite radiological controls associated with the tasks being performed as part of the decommissioning process. The depth and breadth of the RP training program implemented will be commensurate with the radiological hazards faced by the workers. It is designed to ensure that the NRC's regulatory requirements (10 CFR Part 19.12) related to worker training are met.

The RP training program is composed of two primary components. The first is basic radiation worker training. A minimum of 4 hours of radiation safety training is required for all workers and site personnel who in the course of employment are likely to receive

in a year an occupational dose in excess of 100 mrem (1 mSv). This training covers the required topics specified in 10 CFR 19.12 (a)(1) through (6), as well as information contained in the RPP during decommissioning (Section 10) pertinent to the general workforce. Workers and site personnel who are expected to receive as much as 100 mrem of occupational radiation dose in a year are required, annually, to refresh their knowledge in radiation safety principles, procedures, and requirements as they relate to the Tobico Marsh SGA.

Provision is made for exception to the above requirements for personnel performing a specific limited task, or requiring access for observation or similar purposes. Such persons shall have, or will be given, the appropriate radiation and other site-specific training necessary for the radiological conditions expected to be encountered. Such persons shall also have a continuous escort by, or be within continuous view of, a fully trained facility representative

The second component is the task-specific and routine periodic briefings provided to workers and onsite personnel. Task-specific training includes such things as worker briefings on new or revised RWPs while routine periodic briefings include such things as daily worker “tailgate safety briefings.” This component of the training program is considered vital to the safe, efficient, and compliant performance of the tasks leading to decommissioning. It is designed to familiarize workers with the job-specific procedures and safety requirements associated with the scheduled work for the day or operational period, as applicable. It is also the forum in which opportunities for improvement and lessons learned are discussed.

Radiological training will be documented by the person performing the training, whether it is annual radiation worker training or routine periodic training and briefings. Records of radiological training will be securely stored and maintained such that requisite worker training can be readily verified. Records of training will include the names of training recipients and the one(s) providing the training, the date(s) training was provided, the course name or type of training (e.g., Annual Radiation Worker Refresher Training, Tailgate Safety Briefing), and, if other than standardized training or RWP specific training, a brief description of the topic(s) covered. Training records are retained for at least two years, unless otherwise specified in the governing regulations. The QA Specialist will verify that training needs have been assessed, training has been provided, and that documentation of training is provided to the MDNR. Records are securely stored and protected from damage, deterioration, and loss at the MDNR offices in Lansing, Michigan.

## **9.5 CONTRACTOR SUPPORT**

Essentially all decommissioning tasks will be performed by contractors, as the MDNR does not have the resources necessary to accomplish them without the assistance of a contractor. While the decommissioning tasks identified in this DP (Section 8.0) are to be performed by a contractor, MDNR personnel will manage the decommissioning project and communicate with the NRC, as required.

It is not expected that MDNR personnel will be continuously on site during the remainder of the decommissioning process. In reality, the remaining tasks to be completed in connection with the proposed decommissioning alternative are quite benign, having few radiological implications. As a result, continuous MDNR presence onsite during decommissioning activities is not warranted.

The contractor's management and onsite supervisors will be in routine contact as the decommissioning activities proceed. The contractor's field supervisor will provide to both MDNR and contractor management a weekly report (during periods of onsite work activities other than routine surveillance and inspections) summarizing the work accomplished in the previous week. The contractor's field supervisor has the authority to directly contact responsible MDNR project management personnel and the RSO to communicate critical information and to obtain additional authority or approval, as necessary, to perform the site decommissioning in a safe, efficient, and compliant manner.

The MDNR has overall responsibility for the oversight of work performed on the site in support of decommissioning. Oversight responsibility is contractually assigned to the contractor; thus, the contractor has the authority to oversee the performance of the decommissioning activities at the site, whether they are performed by the contractor or by a subcontractor. The MDNR's RSO (or designee) has the responsibility and authority to provide the appropriate oversight of radiological work activities performed.

MDNR does not typically retain authority over contractor (or subcontractor) personnel engaged in work activities at the site. However, MDNR personnel have both the authority and responsibility to intervene and halt unsafe or non-compliant activities or work practices engaged in by contractor or subcontractor personnel.

MDNR intends to contract all training necessary to perform the scheduled decommissioning activities.

The contractor, and by extension, its subcontractors, are required to comply with all radiation safety and license requirements at the facility.

## **9.6 PROJECT TEAM CHANGES**

This DP identifies the current decommissioning project team members. Should it become necessary to involve a new or additional contractor in a line management role, or to replace a project team member, the MDNR will ensure that the contractor and key personnel (as identified in Figure 9-2) meet the minimum requirements committed to in this DP and the MDNR's radioactive materials license. The MDNR will notify the NRC of changes in the project's key personnel.