



Westinghouse Electric Company LLC
Hematite Decommissioning Project
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USA

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Our ref: HEM-14-43
Date: April 15, 2014

Subject: Hematite Decommissioning Project - Revision to the Westinghouse Hematite Decommissioning Plan Chapter 9 (License No. SNM-00033, Docket No. 070-00036)

- References:
- 1) NRC Letter (McConnell) to Westinghouse (Hackmann), dated October 13, 2011, U.S. Nuclear Regulatory Commission Approval of: (1) Westinghouse Hematite Decommissioning Plan, (2) Revised License Application, (3) Exemption from the Requirements of 10 CFR 70.24 and 70.22(a), and Issuance of Hematite License Amendment 57.
 - 2) Westinghouse Letter (Hackmann) to NRC (Document Control Desk) HEM-11-37, dated March 21, 2011: Response to Remaining NRC Request for Additional Information on the Hematite Decommissioning Plan Chapter 9 (License No. SNM-00033, Docket No. 070-00036)
 - 3) Nuclear Regulatory Commission (Hayes) to Westinghouse (Hackmann), dated December 3, 2010; "Westinghouse Hematite Decommission Plan Review Request for Additional Information for Decommissioning Plan Chapter 8 and 9"

Westinghouse has exercised its authority per Section 1.8 of the License Application Request approved by Reference 1 to make limited modifications to the Westinghouse Hematite Decommissioning Project (HDP) Decommissioning Plan (DP) and has incorporated those revisions into DP Chapter 9. The purpose of this letter is to provide the information regarding the revision implemented to DP Chapter 9.

DP Chapter 9.1.1 provides the following statement; *"As the decommissioning of the site progresses, it is expected that changes to the organization will be made by the HDP Project Director. The Project Director will assign or re-assign responsibilities as necessary to ensure safety and compliance during execution of the HDP."* The HDP Project Director has implemented re-assignment of functional area responsibilities with the subsequent change to the organization titles.

In Reference 2, Westinghouse provided the response to the Request for Additional Information Comment HDP-9-Q1 (Reference 3). In the Westinghouse response, in lieu of changes to DP Section 9.2.1, DP Section 9.1.1 was revised to refer to new Table 9-1. The revision to DP Chapter 9 revises Table 9-1 to implement the re-assignment of functional area responsibilities.

Please find as Attachment 1, the revision to the affected sections of DP Chapter 9; Attachment 2, the revision matrix for the revision; Attachment 3 a track change version of the affected sections of DP Chapter 9 to assist in the review; and Attachment 4, HDP-PR-LI-005-1, Change Evaluation Form - Change Number CEF-14-DO-08-004-Chapter 9.

Please contact Dennis Richardson, Manager of Licensing, at 314-810-3368 should you have questions or need any additional information.

Sincerely,



Gay M. Fussell
Deputy Director
Hematite Decommissioning Project

- Attachments:
- 1) Hematite Decommissioning Plan Chapter 9 Revision, Westinghouse Letter HEM-14-43
 - 2) Hematite Decommissioning Plan Chapter 9 Revision Matrix
 - 3) Hematite Decommissioning Plan Chapter 9 Revision, Westinghouse Letter HEM-14-43, with Track Changes
 - 4) Change Evaluation Form - Change Number CEF-14-DO-08-004-Chapter 9

cc: J. J. Hayes, NRC/FSME/DWMEP/DURLD
J. W. Smetanka, Westinghouse
M. M. LaFranzo, NRC Region III/DNMS/MCID

ATTACHMENT 1

**Hematite Decommissioning Plan:
Chapter 9 Revision, Westinghouse Letter HEM-14-43**

Westinghouse Electric Company LLC, Hematite Decommissioning Project

Docket No. 070-00036

DP Chapter 9, Section 9.2.1 second paragraph

Functional area managers are responsible for the subject matter covered by a program or plan. The functional area manager is responsible for ensuring that other organizations impacted by the document are given the opportunity to review them, and any revisions, before issuance. Prior to issuance or revision, the following classifications of documents require the minimum functional management approvals indicated:

- Radiation Protection – Radiation Protection and Project Director;
- Environmental, Safety, Health – ESH and Project Director;
- Material Control and Accounting (MC&A) – Licensing and Project Director;
- Criticality Control – Criticality Safety, Licensing and Project Director;
- Waste Management – Waste Management, Radiation Protection and Project Director;
- Quality Assurance – Quality Assurance and Project Director; and
- Physical Security – Security, Licensing and Project Director.

DP Chapter 9, Table 9-1

Functional Areas	Responsibilities and Authorities
Radiation Protection	<p>Establishes and manages all radiation protection programs.</p> <p>Ensures that activities involving radiation or radioactive material are conducted safely and in accordance with applicable regulatory requirements.</p> <p>Monitors and evaluates potential and/or actual radiation exposures.</p> <p>Establishes appropriate control measures, including source controls.</p> <p>Approves written procedures involving radioactive material.</p> <p>Assures compliance with pertinent procedures and regulations.</p> <p>Performs radiation measurements, sample collection, and analysis, including environmental monitoring for radiological parameters.</p> <p>Responds to and investigates incidents and accidents involving radiation or radioactive material.</p> <p>Maintains radiological records in accordance with quality assurance and regulatory requirements.</p> <p>Reviews and approves subcontractor health physics procedures.</p>
Waste Management	<p>Identifies, controls, and prepares waste for disposal.</p> <p>Provides proper documentation for packages and for shipments by certified, licensed, and/or permitted carriers.</p> <p>Ensures recipients of shipments have proper authorization to receive the shipment.</p>
Field Engineering/ Technical Support	<p>Creates and maintains drawings and graphical information systems.</p>
Operations	<p>Develops technical requirements for the safe and efficient conduct of physical work and planning how physical work will be performed.</p> <p>Coordinates and manages remediation, maintenance, or repair work performed by subcontractors.</p> <p>Conducts remediation, maintenance, or repair work performed by HDP staff.</p> <p>Assists with overseeing remediation, maintenance, or repair work assigned to subcontractors.</p>

Functional Areas	Responsibilities and Authorities
Environmental, Safety, Health	<p>Maintains the environmental, health and safety compliance program in accordance with applicable regulations.</p> <p>Implements the Health and Safety Plan, the emergency action program, the storm water control program, and the environmental monitoring program for non-radiological attributes.</p> <p>Develops and ensures compliance with environmental permits and actions related to chemical cleanup.</p> <p>Coordinates with non-NRC regulators.</p> <p>Manages the study of subsurface water conditions.</p>
Community Relations	<p>Coordinates with the press, public, and community leaders.</p>
Licensing	<p>Ensures compliance with the License SNM-33 and NRC regulations.</p> <p>Coordinates with the NRC, including submittals, license amendments, and Decommissioning Plan.</p> <p>Reviews planned work activities to ensure compliance with SNM-33.</p>
Material Control & Accounting (MC&A)	<p>Ensures the control and management of special nuclear material, including the tracking of its location and quantity and providing overall direction to the project for compliance with the HDP Fundamental Nuclear Material Control Plan.</p>
Nuclear Criticality Safety	<p>Performs a nuclear criticality safety assessment before a new or modified operation is started when the operation may involve sufficient contamination to require defense-in-depth controls.</p> <p>Reviews operations to ensure they follow nuclear criticality safety defense-in-depth controls.</p>
Quality Assurance	<p>Performs audits, surveillances, receipt inspections, and trends their results.</p> <p>Coordinates the corrective action and continual improvement programs.</p> <p>Maintains controls for measuring and test equipment.</p> <p>Evaluates subcontractor quality programs and procedures.</p> <p>Establishes document control and records management requirements.</p> <p>Coordinates and documents training and qualifications of site personnel.</p>
Security	<p>Provides physical security for HDP.</p> <p>Controls access to protected areas and protected information.</p>

Functional Areas	Responsibilities and Authorities
Business Operations	Provides financial, accounting and managerial controls. Coordinates office facilities, informational systems, and administrative support functions. Develops and maintains the HDP schedule. Procures products, materials and services.

ATTACHMENT 2

**Hematite Decommissioning Plan:
Chapter 9 Revision Matrix**

Westinghouse Electric Company LLC, Hematite Decommissioning Project

Docket No. 070-00036

Hematite Decommissioning Plan Chapter 9 Revision Matrix
HEM-14-43

Section	Revision	Basis
9.2.1 second bullet	Revise “Environmental, Health and Safety – EH&S and Project Director” to “Environmental, <i>Safety, Health</i> – <i>ESH</i> and Project Director”.	The revision is to the functional area title. It does not change the minimum functional management approval for procedures as described in the DP Chapter 9.2.1.
Table 9-1 Project Engineering	Revise “Project Engineering” to “ <i>Field Engineering/ Technical Support</i> ”. Move “Develops technical requirements for the safe and efficient conduct of physical work and planning how physical work will be performed” and “Coordinates and manages remediation, maintenance, or repair work by subcontractors” to Operations functional responsibilities and authorities.	The first revision is to the functional area title. It does not change the minimum functional management approval for procedures as described in the DP Chapter 9.2.1. The second revision re-assigns the functional responsibility to operations in accordance with DP Chapter 9.1.1.
Table 9-1 Operations	Insert the above listed functional responsibilities from the Project Engineering section.	The revision re-assigns the functional responsibility to operations in accordance with DP Chapter 9.1.1.
Table 9-1 EH&S	Revise “Environmental, Health and Safety (EH&S)” to “Environmental, <i>Safety, Health</i> ”	The revision is to the functional area title. It does not change the minimum functional management approval for procedures as described in the DP Chapter 9.2.1.
Table 9-1 Training	Move the listed responsibility to Quality Assurance and delete the section.	The revision re-assigns the functional responsibility to operations in accordance with DP Chapter 9.1.1.
Table 9-1 Quality Assurance	Insert the training functional responsibility from the training section.	The revision re-assigns the functional responsibility to operations in accordance with DP Chapter 9.1.1.
Table 9-1 Project Controls	Revise “Project Controls” to “ <i>Business Operations</i> ”.	The revision is to the functional area title. It does not change the minimum functional management approval for procedures as described in the DP Chapter 9.2.1.

ATTACHMENT 3

**Hematite Decommissioning Plan:
Chapter 9 Revision, Westinghouse Letter HEM-14-43, with Track Changes
Westinghouse Electric Company LLC, Hematite Decommissioning Project
Docket No. 070-00036**

DP Chapter 9, Section 9.2.1 second paragraph

Functional area managers are responsible for the subject matter covered by a program or plan. The functional area manager is responsible for ensuring that other organizations impacted by the document are given the opportunity to review them, and any revisions, before issuance. Prior to issuance or revision, the following classifications of documents require the minimum functional management approvals indicated:

- Radiation Protection – Radiation Protection and Project Director;
- Environmental, ~~Health and~~ Safety, ~~Health~~ – EH&SH and Project Director;
- Material Control and Accounting (MC&A) – Licensing and Project Director;
- Criticality Control – Criticality Safety, Licensing and Project Director;
- Waste Management – Waste Management, Radiation Protection and Project Director;
- Quality Assurance – Quality Assurance and Project Director; and
- Physical Security – Security, Licensing and Project Director.

DP Chapter 9, Table 9-1

Functional Areas	Responsibilities and Authorities
Radiation Protection	<p>Establishes and manages all radiation protection programs.</p> <p>Ensures that activities involving radiation or radioactive material are conducted safely and in accordance with applicable regulatory requirements.</p> <p>Monitors and evaluates potential and/or actual radiation exposures.</p> <p>Establishes appropriate control measures, including source controls.</p> <p>Approves written procedures involving radioactive material.</p> <p>Assures compliance with pertinent procedures and regulations.</p> <p>Performs radiation measurements, sample collection, and analysis, including environmental monitoring for radiological parameters.</p> <p>Responds to and investigates incidents and accidents involving radiation or radioactive material.</p> <p>Maintains radiological records in accordance with quality assurance and regulatory requirements.</p> <p>Reviews and approves subcontractor health physics procedures.</p>
Waste Management	<p>Identifies, controls, and prepares waste for disposal.</p> <p>Provides proper documentation for packages and for shipments by certified, licensed, and/or permitted carriers.</p> <p>Ensures recipients of shipments have proper authorization to receive the shipment.</p>
<div>FieldProject</div> <div>Engineering/</div> <div>ManagementTechnical</div> <div>Support</div>	<p>Develops technical requirements for the safe and efficient conduct of physical work and planning how physical work will be performed.</p> <p>Coordinates and manages remediation, maintenance, or repair work performed by subcontractors.</p> <p>Creates and maintains drawings and graphical information systems.</p>

Functional Areas	Responsibilities and Authorities
Operations	<p>Develops technical requirements for the safe and efficient conduct of physical work and planning how physical work will be performed.</p> <p>Coordinates and manages remediation, maintenance, or repair work performed by subcontractors.</p> <p>Conducts remediation, maintenance, or repair work performed by HDP staff.</p> <p>Assists with overseeing remediation, maintenance, or repair work assigned to subcontractors.</p>
Environmental, Health and Safety, (EH&S) Health	<p>Maintains the environmental, health and safety compliance program in accordance with applicable regulations.</p> <p>Implements the Health and Safety Plan, the emergency action program, the storm water control program, and the environmental monitoring program for non-radiological attributes.</p> <p>Develops and ensures compliance with environmental permits and actions related to chemical cleanup.</p> <p>Coordinates with non-NRC regulators.</p> <p>Manages the study of subsurface water conditions.</p>
Training	Coordinates and documents training and qualifications of site personnel.
Community Relations	Coordinates with the press, public, and community leaders.
Licensing	<p>Ensures compliance with the License SNM-33 and NRC regulations.</p> <p>Coordinates with the NRC, including submittals, license amendments, and Decommissioning Plan.</p> <p>Reviews planned work activities to ensure compliance with SNM-33.</p>
Material Control & Accounting (MC&A)	Ensures the control and management of special nuclear material, including the tracking of its location and quantity and providing overall direction to the project for compliance with the HDP Fundamental Nuclear Material Control Plan.

Functional Areas	Responsibilities and Authorities
Nuclear Criticality Safety	<p>Performs a nuclear criticality safety assessment before a new or modified operation is started when the operation may involve sufficient contamination to require defense-in-depth controls.</p> <p>Reviews operations to ensure they follow nuclear criticality safety defense-in-depth controls.</p>
Quality Assurance	<p>Performs audits, surveillances, receipt inspections, and trends their results.</p> <p>Coordinates the corrective action and continual improvement programs.</p> <p>Maintains controls for measuring and test equipment.</p> <p>Evaluates subcontractor quality programs and procedures.</p> <p>Establishes document control and records management requirements.</p> <p>Coordinates and documents training and qualifications of site personnel.</p>
Security	<p>Provides physical security for HDP.</p> <p>Controls access to protected areas and protected information.</p>
<div>Project</div> <div>Controls</div> <div>Business Operations</div>	<p>Provides financial, accounting and managerial controls.</p> <p>Coordinates office facilities, informational systems, and administrative support functions.</p> <p>Develops and maintains the HDP schedule.</p> <p>Procures products, materials and services.</p>

ATTACHMENT 4

**Hematite Decommissioning Plan:
Change Evaluation Form - Change Number CEF-14-DO-08-004-Chapter 9
Westinghouse Electric Company LLC, Hematite Decommissioning Project
Docket No. 070-00036**

Hematite Decommissioning Project	Procedure: HDP-PR-LI-005, <i>Facility Change Management</i>	
	Revision: 3	Page 1 of 6

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

CHANGE NUMBER: CEF-14- DO-08-004-Chapter 9	Date: April 2, 2014
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A. ITEM BEING CHANGED OR WORK ACTIVITY:

Westinghouse Electric Corporation is planning to make changes to the management organizational assignments of the Hematite Decommissioning Project (HDP) located at 3300 State Road P, Festus, Missouri 63028. Prior to implementing any changes, Management Change Review has been requested by the HDP Project Director to make sure that the proposed changes are consistent with license conditions and the intent of the United States Nuclear Regulatory Commission (NRC) approved Decommissioning Plan (DP).

B. DESCRIPTION OF PROPOSED CHANGE OR WORK ACTIVITY (attach additional pages as required):

HDP Organization change is proposed as a result of the termination of the contract with the remediation contractor and to improve coordination of programmatic and field activities.

C. QUESTIONS

Question 1: Does the proposed change or work activity conflict with or change the margin to compliance with SNM-33 or a regulatory requirement? Include applicable requirements or the change to the margin of compliance.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

CHANGE NUMBER: CEF-14- DO-08-004-Chapter 9

Date: April 2, 2014

Basis:

License condition 15 of SNM-33 Amendment 64 states;

Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.

- A. Westinghouse HEM-11-96, "Final Supplemental Response to NRC Request for Additional Information on the Hematite Decommissioning Plan and Related Revision to a Pending Licensing Action", July 5, 2011 except for Attachment 18. (ADAMS Accession Nos. ML111880290 and ML111880292)
- B. Documents identified in Chapter 1 of NRC Decommissioning Plan SER ADAMS Accession No. (ML112101630).
- C. Westinghouse HEM-11-56, "Evaluation of Technetium-99 Under the Process Buildings", May 5, 2011. (ADAMS Accession No. ML111260624).
- D. Documents identified in the NRC's 10CFR20.2002 SERs associated with Amendment Nos. 58 and 60. (ADAMS Accession Nos. ML111441087 and ML12158A401).
- E. Westinghouse HEM-12-101, "Special Nuclear Material License Application for the Hematite Decommissioning Project", August 16, 2012. (ADAMS Accession No. ML12233A362)

These documents are related to the Decommissioning Plan, therefore they are discussed in Question 2.

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

CHANGE NUMBER: CEF-14- DO-08-004-Chapter 9 **Date:** April 2, 2014

Question 2: Does the proposed change or work activity conflict with the intent of the DP or degrade safety or environmental commitments as described in the DP or reduce the margin of safety within the commitment? Include applicable DP requirements reviewed, and confirm there are no significant adverse effects on the quality of work demonstrating regulatory compliance, the remediation objectives, or health and safety. For environmental commitments, consider the justification requirements of DP Chapter 11.3 and the Program Revision Criteria in HDP-PO-EM-001.

☐ Yes

☒ No

Basis:

HEM-11-37 response to NRC RAI contains Table 9-1 to Decommissioning Plan Chapter 9. The table describes the functional areas of the project and the responsibilities and authorities within the functional areas.

The proposed organizational change has been reviewed to the Table 9-1 of the DP (see attached). The proposed change does not conflict with the requirements contained within the DP.

The proposed change has been reviewed to determine if the revised organization reporting structure does not impact or conflict with the requirements and responsibilities of the Project Director, RSO, and other organizational requirements in the DP. The proposed change does not result in a conflict with the requirements of the DP.

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

CHANGE NUMBER: CEF-14- DO-08-004-Chapter 9 **Date:** April 2, 2014

Question 3: Does the proposed change or work activity result in a conflict or reduce the margin to compliance of the regulatory requirements contained within a site policy, program, plan or other document, including the PSP and FNMCP? Include applicable requirements.

☐ Yes ☒ No

Basis:

The proposed change does not conflict with a site policy or program.

HDP-PO-GM-007, Project Management Plan was reviewed specifically for any conflict in regards to reporting relationships. No conflict was identified.

HDP-PO-QA-001, Project Quality Plan (PQP) section 7.6 was specifically reviewed to ensure the proposed organization did not conflict with the reporting requirements as described. No conflict was identified.

Westinghouse Electric Corporation Level I Quality Management System was reviewed in regards to reporting relationships. No conflict was identified.

The PSP and FNMCP define responsibilities in regards to Security and MC&A as well as the requirement that these two functional areas cannot be managed by the same Manager. There is no change in that regard, therefore no conflict was identified.

Question 4: Does the proposed change or work activity conflict with or reduce the margin to safety or compliance to the conclusions of actions analyzed in the Environmental Assessment(s) or Safety Evaluation Report(s) for the project.

☐ Yes ☒ No

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

CHANGE NUMBER: CEF-14- DO-08-004-Chapter 9	Date: April 2, 2014
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Basis:

Reviewed the EA for the DP. The proposed change does not conflict with the Environmental Assessment as the Environmental Assessment does not discuss management organization.

Reviewed the SER and specifically Section 9.0, Project Management and Organization. Specifically, SER section 10.2.1, NCS Functions, states "...to the extent practical, from Operations because the RSO who is responsible for NCS, reports directly to the Project Director...." The proposed change does not conflict with the SER statement in regards to the reporting relationship of the RSO.

Question 5: Does the proposed change result in a change to any of the following elements of Final Status Survey activities as approved in the Decommissioning Plan?

- Does the proposed change increase the approved radionuclide-specific DCGLs or area factors?
- Does the proposed change result in increasing the probability of making a Type I decision error above the level stated in the DP?
- Does the proposed change result in increasing the investigation level thresholds for a given survey unit classification?
- Does the proposed change result in changing the classification of a survey unit from a more restrictive classification to a less restrictive classification (e.g. Class 1 to Class 2)?
- Does the proposed change reduce the coverage requirements for scan measurements?
- Does the proposed change use a statistical test other than the Sign test or Wilcox Rank Sum test for data evaluation?
- Does the proposed change degrade dose modeling or final radiological surveys?

☐ Yes ☒ No

Basis:

The proposed change does not impact any element of Final Status Survey requirements as provided in the DP.

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

D. Licensing Manager

I concur that the proposed change or site work activity:

- (a) ☒ Can be implemented within the current Hematite License SNM-33 and regulatory requirements without NRC approval of the change or work activity prior to making the change or starting the work activity; or,
- (b) ☐ Requires NRC approval of the change or work activity prior to making the change or starting the work activity.

DENNIS RICHARDSON / *Dennis Richardson*
Licensing Manager (Print/Sign)

4/2/2014
Date

Date NRC notified: Within 30 days of change Person Making Notification: Project Director

Method of Notification: Submittal Letter to the NRC

**ATTACHMENT TO HDP-PR-LI-005-1 CHANGE EVALUATION FORM
CEF-14- DO-08-004-Chapter 9**

Assessment of the Proposed Organization Change

Functional Areas RAI Response HDP-9-Q1 HEM-11-37	Responsible Position for Proposed Functional Areas	Responsibilities and Authorities As provided in RAI Response HDP-9-Q1, HEM-11-37
Radiation Protection	RSO	<p>Establishes and manages all radiation protection programs. Ensures that activities involving radiation or radioactive material are conducted safely and in accordance with applicable regulatory requirements. Monitors and evaluates potential and/or actual radiation exposures. Establishes appropriate control measures, including source controls. Approves written procedures involving radioactive material. Assures compliance with pertinent procedures and regulations. Performs radiation measurements, sample collection, and analysis, including environmental monitoring for radiological parameters.</p> <p>Responds to and investigates incidents and accidents involving radiation or radioactive material.</p> <p>Maintains radiological records in accordance with quality assurance and regulatory requirements.</p> <p>Reviews and approves subcontractor health physics procedures.</p>
Waste Management	Waste Management	<p>Identifies, controls, and prepares waste for disposal.</p> <p>Provides proper documentation for packages and for shipments by certified, licensed, and/or permitted carriers.</p> <p>Ensures recipients of shipments have proper authorization to receive the shipment.</p>
Project Engineering/ Management	Field Operations	<p>Develops technical requirements for the safe and efficient conduct of physical work and planning how physical work will be performed.</p> <p>Coordinates and manages remediation, maintenance, or repair work performed by subcontractors.</p>
	Field Engineering/ Technical Support	<p>Creates and maintains drawings and graphical information systems.</p>

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

Functional Areas RAI Response HDP-9-Q1 HEM-11-37	Responsible Position for Proposed Functional Areas	Responsibilities and Authorities As provided in RAI Response HDP-9-Q1, HEM-11-37
Operations	Field Operations	Conducts remediation, maintenance, or repair work performed by HDP staff. Assists with overseeing remediation, maintenance, or repair work assigned to subcontractors.
Environmental Health and Safety (EH&S)	Environmental, Safety, Health/Quality Assurance (ESH/QA)	Maintains the environmental, health and safety compliance program in accordance with applicable regulations. Implements the Health and Safety Plan, the emergency action program, the storm water control program, and the environmental monitoring program for non-radiological attributes. Develops and ensures compliance with environmental permits and actions related to chemical cleanup. Coordinates with non-NRC regulators. Manages the study of subsurface water conditions.
Training	Conduct of Operations	Coordinates and documents training and qualifications of site personnel.
Community Relations	Project Director	Coordinates with the press, public, and community leaders.
Licensing	Licensing	Ensures compliance with the License SNM-33 and NRC regulations. Coordinates with the NRC, including submittals, license amendments, and Decommissioning Plan. Reviews planned work activities to ensure compliance with SNM-33.
Material Control & Accounting (MC&A)	Licensing	Ensures the control and management of special nuclear material, including the tracking of its location and quantity and providing overall direction to the project for compliance with the HDP Fundamental Nuclear Material Control Plan.
Nuclear Criticality Safety	Licensing	Performs a nuclear criticality safety assessment before a new or modified operation is started when the operation may involve sufficient contamination to require defense-in-depth controls. Reviews field operations to ensure they follow nuclear criticality safety defense-in-depth controls.

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

Functional Areas RAI Response HDP-9-Q1 HEM-11-37	Responsible Position for Proposed Functional Areas	Responsibilities and Authorities As provided in RAI Response HDP-9-Q1, HEM-11-37
Quality Assurance	ESH/QA	<p>Performs audits, surveillances, receipt inspections, and trends their results.</p> <p>Coordinates the corrective action and continual improvement programs.</p> <p>Maintains controls for measuring and test equipment.</p> <p>Evaluates subcontractor quality programs and procedures.</p> <p>Establishes document control and records management requirements.</p>
Security	Security	<p>Provides physical security for HDP.</p> <p>Controls access to protected areas and protected information.</p>
Project Controls	Project Director	<p>Provides financial, accounting and managerial controls.</p> <p>Coordinates office facilities, informational systems, and administrative support functions.</p> <p>Develops and maintains the HDP schedule.</p> <p>Procures products, materials and services.</p>

Radiation Protection/RSO

All functional area responsibilities remain with the RSO as well as stop work authority as provided in the DP. The RSO reports directly to the Project Director in regards to radiological program areas (as acknowledged in the DP SER). The RSO reports to ESH/QA Manager in regards to schedule, budget and coordination of activities.

Waste Management

All functional area responsibilities remain with WM. WM reports to Field Operations in regards to planning, coordination and performance of field activities. Technical and programmatic authority remains with the RSO.

Project Engineering/Management – Field Operations –Field Engineering

The functional area responsibilities have been have been assigned to Field Operations and Field Engineering. Both positions report to the Project Director.

Operations – Field Operations

There are no changes in regards to the functional area responsibilities and authorities.

**HDP-PR-LI-005-1
CHANGE EVALUATION FORM**

EH&S – ESH/QA

There are no changes in regards to the functional area responsibilities and authorities.

Training – Conduct of Operations

There are no changes in regards to the functional area responsibilities and authorities. As with the previous Training Supervisor position, the Conduct of Operations position continues to report to the QA Manager.

Community Relations

There are no changes in regards to the functional area responsibilities and authorities.

Licensing, MC&A, NCS

There are no changes in regards to the functional area responsibilities and authorities.

Quality Assurance – ESH/QA

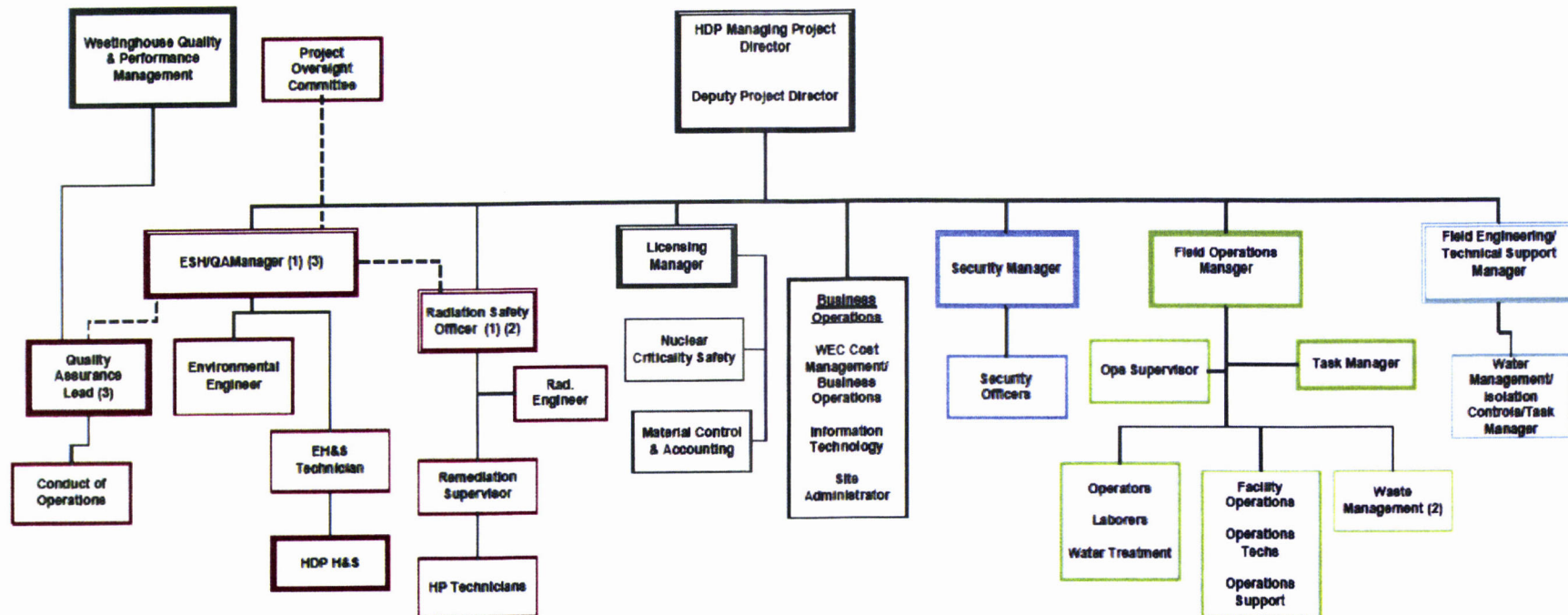
There are no changes in regards to the functional area responsibilities and authorities. The proposed organization has been established to ensure the requirement of HDP-PO-QA-001, Project Quality Plan (PQP) section 7.6 is met in that to maintain independence the Quality Assurance Lead reports to the Westinghouse Electric Company Nuclear Services Business Unit Quality & Performance Management. The ESH/QA Manager reports to the Project Director.

Security

There are no changes in regards to the functional area responsibilities and authorities.

Project Controls

There are no changes in regards to the functional area responsibilities and authorities.



(1). RSO reports to the Project Director for radiation protection functional area responsibilities. RSO reports to ESH/QA Manager for schedule, budget and coordination of activities.

(2). Waste Management reports to the Field Operations Manager for schedule, budget and coordination of activities. Waste Management programmatic responsibilities and authority resides with the RSO.

(3). Quality Lead reports to Westinghouse Quality & Performance Management. Quality Lead reports to ESH/QA Manager for schedule, budget and coordination of activities.

April 2, 2014