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Revision 0

Project Execution Plan
for the
General Electric Vallecitos
Nuclear Center Removal Project

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1.0 PROJECT OVERVIEW

The Project Execution Plan (PXP) for the General Electric Vallecitos Nuclear Center (GEVNC) Removal Project has been prepared under the Washington Division of URS Corporation guidelines for the Project Execution Management Program, in accordance with MP1.42, *WTS Project Execution Management Program* and WP15-GM.01, *WTS Project Execution Plans*. This plan utilizes a graded approach to address key issues associated with the project.

This PXP describes the scope, schedule, and budget in Fiscal Year (FY) 2008 and 2009 for the Removal Project at the GEVNC. The project will be conducted by Washington TRU Solutions (WTS) a division of WGI. The purpose of the PXP is to document the baseline work scope and delineate the processes to be used to provide sound project management for the Removal Project.

The WTS provides waste characterization, packaging, operations, and transportation services to the U.S. Department of Energy (DOE) generator sites that require waste characterization and disposal of transuranic (TRU) waste at the Waste Isolation Pilot Plant (WIPP). WTS has experience in permitting, characterization and certification, and transportation of wastes.

WTS deployment provides the Host site (GEVNC) with a characterization and shipping program that has been previously certified at various DOE sites. The deployment provides for mobilization, set-up and certification of the program. The TRU characterization process is highly regulated and prescriptive with requirements derived from the DOE, the U.S. Nuclear Regulatory Commission (NRC), U.S. Department of Transportation (DOT), U.S. Environmental Protection Agency (EPA), and the New Mexico Environment Department (NMED).

2.0 PROJECT OVERVIEW

2.1 Project History

GEVNC has generated legacy remote-handled (RH) TRU waste from Research and Development (R&D) operations. GEVNC has an estimated 105 cubic meters of RH waste and an estimated 35 cubic meters of contact-handled (CH) waste, which is located in a single hot cell.

2.2 Project Description





2.3 Project Scope of Work

The following activities will be implemented for the Removal Project:

2.3.1 Establish Project Team to include:

- Project management
- Project engineering and operation
- Operational personnel, including supervision
- AK and certification personnel
- Quality Assurance Support
- RH and CH Program Training
- Document Control

2.3.2 AB activities to consider are the following:

- Support the Host site with the documentation of the canister loading and RH-72B Cask loading
- Support the Host site with the documentation of the TRUPACT-II loading
- Support the Host site with other documentation as necessary to support general implementation of AB requirements

2.3.3 Provide AK Summary Reports for the waste including confirmation documentation of inventory, compiling AK, assessing AK information, and resolving discrepancies associated with AK documentation.

2.3.4 Develop program documents and procedures to include the following, but not limited to:

- Characterization and certification operations
- Shipping cask loading and operational procedures

2.3.5 Provide trained personnel for characterization, a cross-trained loading and shipping team (as appropriate), and leak testing equipment.

- Remote inspection equipment and personnel
- Leak testing personnel and equipment
- Cask and canister loading personnel and equipment
- Procurement and receipt inspection of consumable materials and supplies
- Personnel to perform characterization activities

2.3.6 Perform maintenance and/or replacement of WTS-furnished equipment, as needed.

- Spare parts
- Tools

- Craft/subcontractor support
- Maintaining measurement and testing equipment and equipment calibration

2.3.7 Conduct waste retrieval mockup and testing, as required.

2.3.8 Support audits, assessments, and surveillances.

- Support the Readiness Assessment or Operational Readiness Review preparations and implementation.
- Support certification audits and perform operational startup and waste retrieval, inspections, characterization, certification, waste loading, and shipment to the WIPP/INL.

2.3.9 The project scope for WTS does **NOT** include:

- Facilities for waste staging and storage
- Decontamination and Decommissioning
- Disposal of generated wastes and excess materials
- Environmental and radiological area monitoring equipment
- Office space and equipment at GEVNC
- Communications equipment and interfaces
- Utilities at GEVNC
- Security services
- Funding for GEVNC personnel, facilities, and equipment
- Environmental Safety, and Health (ES&H) and radiological support
- Job Hazard Analyses, Work Packages, and Radiological Work Permits
- General oversight of work performed by WTS at the GEVNC

2.3.10 Project Goals and Objectives

The project objective is to complete the removal of the TRU waste at GEVNC with zero recordable injuries, meeting permit and transportation requirements, and within budget and schedule. The project schedule is prepared to achieve the first shipment to the WIPP in Calendar Year 2009. Cost estimates and budgets have been established for the project and DOE funding is being negotiated.

2.3.11 Contract Considerations

WTS operates under a cost-reimbursable contract with the DOE Carlsbad Field Office (CBFO). Funding is provided on a fiscal year basis.

2.3.12 Management Overview of the Project Execution

The RH Waste Program Manager (PM) is the Project Sponsor and is responsible for the execution of the project in accordance with the contract, WIPP procedures, and company policy. The direction and management of project activities are conducted in accordance with URS/WTS Project Management Policies and approved WIPP procedures. The RH Waste Program Manager will maintain an active communications program to assure DOE and WTS management and personnel are apprised of performance and other issues affecting as-planned project execution.

2.3.13 Project Management Authority

The Project Manager is responsible for safe and compliant execution and completing authorized scope within approved budget and schedule. Management and operating contractor project management authority is established to prioritize, direct, and provide status of activities related to the project. WTS first line managers are responsible for allocations of personnel, funds, and other resources described therein.

2.3.14 Management Philosophy

WTS manages and operates the WIPP to set the standard for achieving excellence in the performance of all activities. WTS systematically integrates safety and environmental compliance into management and work practices at all levels of the organization so that the WIPP mission is accomplished while protecting the worker,

the public, and the environment. Emphasis is placed on a knowledgeable individual's responsibility to perform their task in a safe manner, compliant with all requirements, and produce quality work. Management emphasizes that employees are expected to stop work if a safety concern arises or conditions change.

2.3.15 Customer Identification

The CBFO is the customer for this project. The primary contacts are the Assistant Manager for Operations and the Office Director of the Office of Characterization and Transportation.

A secondary customer is the GEVNC Host site. The Project Manager will interface directly with the Facility Manager at GEVNC.

Routine integration meetings and conference calls will be conducted by the Project Manager to provide integration and status on the project.

2.3.16 Project Location

The Project will be conducted at GEVNC. Project planning and support personnel are located in Carlsbad, New Mexico. Site operations personnel are located at the WIPP site and will support the Removal Project.

2.3.17 Third Party Organizations

Washington Regulatory and Environmental Services (WRES) will provide support to the Project. WRES is the primary interface with the regulatory groups such as NMED and EPA. In addition, DOE certification will be required to certify and ship RH waste to the WIPP. CBFO will have lead authority for performing the RH Certification Audit using the CBFO Technical Assistance Contractor (Navarro).

Several subcontractors will be used on the project. Subcontracts will be issued for procurement of supplies, equipment, engineering support, remote inspection services, maintenance, and other services as identified. All subcontracts will flow down applicable safety and compliance requirements.

2.3.18 Partnering

There are no partnering organizations involved in this removal task.

One key aspect to the success of this project is the coordination and alignment with the GEVNC organization and contractors. Key interfaces with the local DOE Site Office will be required to successfully complete this project. Roles and responsibilities are defined in CCP-PO-502, *CCP/GEVNC Interface Document*.

2.3.19 Release to Proceed

The work scope is authorized scope under the current WTS prime contract.

Actual fieldwork activities will not be permitted until a management and/or readiness assessment is completed in compliance with project requirements, as required.

2.3.20 Applicable Reference Documents

- 10 Code of Federal Regulations (CFR) 830.120, Subpart A, *Quality Assurance Requirements*
- DOE Order 414.1, *Quality Assurance*
- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Class Permit Modification Request* submitted to NMED on April 29, 2005
- DOE/CBFO-94-1012, *U.S. Department of Energy Carlsbad Field Office Quality Assurance Program Document*
- DOE/CBFO-95-1122, *Carlsbad Field Office Programmatic Change Control Process*
- DOE/CBFO 03-3292, *CBFO Risk Management Plan*
- DOE/WIPP 02-3284, *RH Packaging Operations Manual*
- MP 1.42, *WTS Project Execution Management Program*
- WP 13-QA1002, *Visual Inspection*
- WP 13-QA1003, *Quality Assurance Receipt/Source Inspections*
- WP 13-QA3004, *Nonconformance Report*

- WP 15-GM.01, *WTS Project Execution Plans*
- WP 15-PC3605, *Proposal, Competition, Identification, Selection, Evaluation, and Award*
- WP 15-PC3609, *Preparation of Purchase Requisitions*
- *RH-TRU 72-B Safety Analysis Report*
- Certificate of Compliance No. 9212 for Model No. RH-TRU 72-B Package, U.S. Nuclear Regulatory Commission
- Certificate of Compliance No. 9218 for Model No. TRUPACT-II
- *TRUPACT-II Safety Analysis Report*

3.0 PROJECT ORGANIZATION

In order to accomplish the planned scope of work successfully, WTS has established a program management organization to provide technical and administrative support for all waste characterization, operations, and shipping activities at the Host sites. Effective deployment and mobilization of equipment and personnel are also important to maintain approved budgets and project schedules.

Program management includes project office support for site characterization. The role of the Project Office is to coordinate all project activities at the Host sites to be as efficient and cost effective as possible. Coordination of the AB between the project site is of prime consideration, including characterization equipment selection, safety analysis, radiation and industrial safety planning, emergency management, and environmental documentation and permitting. The functions of the Project Office include:

- Serve as lead interface with CBFO and the Host site for project activities.
- Establish the scope of work and program objectives for the project, including the requirements to be accomplished at the Host site.
- Ensure project resources and develop staffing plan.
- Provide purchasing support.

- Coordinate and maintain characterization and operations documentation and records, including plans and procedures.
- Develop and maintain a consistent framework for applicable AB implementation for the project.
- Manage Project Level Batch Data Reports and characterization data through the WIPP certification process.
- Ensure appropriate training of project personnel.
- Prepare, maintain, and update project budgets and schedules.
- Formally maintain configuration control of project scope, schedule, and budget.
- Coordinate and resolve issues for the project.

The GEVNC Removal Project will be managed by an assigned Project Manager. The RH Project Manager functions as the primary interface and point-of-contact between WTS and the Host site on this project.

Key project personnel required for the project include:

Project Sponsor	[REDACTED]
Project Manager	[REDACTED]
Site Project Manager	[REDACTED]
Waste Certification Official	[REDACTED]
Operations Superintendent/ Vendor Project Manager (VPM)	[REDACTED]
Procurement	[REDACTED]
QA Oversight	[REDACTED]
QA Programs	[REDACTED]
Safety Specialist	[REDACTED]
Cognizant Engineer	To be determined

Project Engineer	██████████
Regulatory Permitting	██████████
Project Controls	██████████
Scheduling	██████████

The GEVNC Removal Project will be implemented under the Waste Services at Sites Work Breakdown Structure (WBS) element, based on the funding allocation from CBFO.

The project team will develop a project work breakdown to fit within WBS 1.1.4, Small Quantity Sites, to track TRU waste removal for cost and schedule performance. The developed cost accounts will be managed by the Program Manager and matrixed functions/support (i.e., quality) will be managed by the respective Cost Account Manager.

4.0 PROJECT ADMINISTRATION

It is WTS's responsibility to ensure that the activities of each of the primary and lower-tier subcontractors result in the timely completion of project activities, while ensuring that the site remains in compliance with the wide array of safety, environmental, security, labor, and contract requirements. WTS integrates these activities through the following key activities:

- Preparation of plans which examine various project cost and schedule improvements as well as impact due to changing technical requirements.
- Preparation of project baselines and direction of the work planning needed to implement such plans.
- Management of cross-cutting activities, such as Environmental, Safety, Health, and Quality (ESH&Q) disciplines by development of the project requirements, establishment and tracking of program metrics, audits and assessments, and management reporting.
- Direct management of the subcontractors.
- Daily and weekly production discussions, integration and operations meetings that track project progress and identify and resolve issues. Ad hoc teams are established, as needed, to address problem areas such as characterization capacity, resource allocation, and shipping logistics.

5.0 PROJECT BUDGET AND SCHEDULE

The baseline budget for GEVNC TRU waste removal project work scope is:

- FY 2008 [REDACTED]
- FY 2009 [REDACTED]
- FY 2010 [REDACTED]

FY 2009 and FY 2010 cost estimates are expressed in FY 2008 dollars and includes WTS and subcontractor labor, materials and supplies, and equipment. Baseline funding is provided by CBFO.

The cost estimate assumes:

- 275 RH drums and 25 CH drums for a total of 300 drums.
- Debris waste streams only; no solid sampling analysis.
- One waste stream (CH & RH); AK to be completed in FY 2008.
- One lot (ten samples) for HSG summa sampling at the end of the project (FY 2010) when all CH drums have been determined.
- Fifty RH drums and 25 CH drums are sampled for Flammable Gas Analysis.
- No radiography is necessary; only VE operations are to be performed.
- Use qualified Host site personnel to perform VE and DTC activities with Central Characterization Project (CCP) personnel performing oversight and completing documentation.
- CBFO provides separate funding for the Mobile Loading Unit team and equipment.
- Procurement of 92 Removable Lid Canisters (RLCs) in FY 2009, while FY 2010 RLC funding is for storage and delivery.
- The procurement of drums, liners, and filters are not included in this cost estimate. DOE-Oakland will transfer funding to CBFO to cover these procurements.
- The CCP VPM is qualified to provide VE and DTC oversight.

6.0 PROJECT RESOURCES

WTS is comprised of approximately 600 WTS and subcontracted technical personnel. Another 50 vendor personnel operate the leased mobile characterization systems at the various DOE sites. Additional WTS personnel may be added based on the project activities and technical requirements at any DOE site. However, any workers who are foreign nationals will require advance prior approval before being allowed on site.

The WTS program is organized by project, with a project manager assigned to each project to ensure effective project management of all activities. WTS also maintains a Project Certification organization to perform certified data entry into the WWIS and final waste certification. Project Certification contains the Waste Certification Officials for certifying all waste characterized and shipped by WTS.

WTS will provide staffing for the planning, characterization, procurement, engineering, operations, radiation control, safety, Quality Assurance (QA) oversight, and management. Staffing requirements were considered in the cost estimate and are included in the baseline budget. Additional staffing will be required for WTS. Mobilization costs of new hires have been included in the cost estimate for WTS employees moving to Carlsbad. Per-diem costs have also been included for certain employee costs at GEVNC.

6.1 Training Requirements

WTS will provide training for the project team and will coordinate site-specific training required by GEVNC. GEVNC will provide the site-specific training. The training requirements will satisfy both WTS project needs and GEVNC site training needs. This will be identified in a training matrix or qualification card process to effectively manage and control training. This will be verified by the readiness activities.

6.2 Computer Requirements

Computers will be funded and provided by the project. There may be special security requirements for computers at GEVNC. GEVNC will provide WTS access to communications lines for e-mail and internet access.

6.3 Space Requirements

The project team will be provided office space by GEVNC. Project equipment will be staged in a secure area. GEVNC will provide telephones, copy machines, and fax machines. WTS will provide other standard office equipment.

6.4 Site Utilities

GEVNC will provide all site utilities for the project. No special utility requirements are identified at this time.

7.0 UNIQUE PROJECT CONSIDERATIONS

7.1 Host Site Relations

WTS will implement and utilize specific communication processes and methods to maintain effective and productive relations with the GEVNC staff. The methods include: (1) integrated planning and agreement with the Host site; (2) formal and documented communications to ensure full understanding of the work scope; (3) routine progress update and issues notification; and (4) a team approach to work accomplishment and problem solving. It is important that all team members, including DOE, integrating contractors, and subcontractors, communicate effectively and maintain a business-like approach to managing performance.

WTS will accomplish its mission following accepted project management policies and procedures, including the development and execution of this PXP. Integration activities include coordination with other DOE sites, external agencies, and the public stakeholders. Internal project integration throughout WTS is also required. Once identified, the initial project team will coordinate with the GEVNC staff. This coordination will include site planning, information and resource exchange, and preparation of contractual and interface documents to formally identify roles and responsibilities, funding, and agency agreements. In general, the primary focus will be on effective information exchange through timely communications and formal correspondence.

7.2 Project Execution Plan (PXP) Implementation

This PXP will be issued and controlled by WTS. This plan describes the plans and objectives for FY 2009 and 2010 and establishes a formal structure for conducting work processes within the GEVNC RH Project. This formal structure will include the following:

- Establishment of baseline Project Schedules under Change Control within WTS.
- Establishment of Baseline Cost Estimates, Personnel/Resources, and Budgets for the project under Change Control within WTS.

- Development of Standardized Performance Indicators for the project for safety reporting, quality trending, management progress tracking and reporting.
- Establishment of Configuration Control for the Project.
- Utilization of an Issues Management system for action tracking and completion.
- Development of concise standardized informational briefings for interested parties.
- Development of an agenda and establish monthly Project Reviews.

7.3 Lessons Learned Implementation

Lessons learned from characterization work at the current active sites and operations at the WIPP site are a tremendous resource for improving the implementation on this project. Many of these lessons will be incorporated into the planning for this project. The following examples of lessons learned information have been documented to date:

- Establish AB and procedures before mobilization of equipment to the Host site.
- Utilize standardized equipment and procedures to the maximum extent possible.
- Establish clear roles and responsibilities between WTS and the Host site in the Interface Document.
- Optimize scheduling of external audits to ensure effective corrective actions and management oversight.
- Implement sound project management practices and configuration control.
- Incentivize employees and subcontractors toward the same goals.
- Evaluate the appropriate timing for mobilization at each Host site.
- Confirm Readiness Review decisions before deployment of project resources.

- Establish a strong conduct of operation culture at the start of any new project.

New lessons learned identified throughout the DOE complex will be reviewed and discussed with project personnel throughout the project as they are identified. The project team will prepare formal lessons learned, during and after project implementation/operation, to be shared with other project teams.

8.0 ENGINEERING AND DESIGN

DOE Hoisting and Rigging requirements will be adhered to, and a professional engineer/competent person shall review all critical lifts as identified.

The engineer's scope of work shall include the following, as necessary:

- Prepare equipment specification and packages.
- Review and approve the Contractor Lift Plan.
- Participate in the final inspections.
- Develop and approve technical data and drawings.
- Interface with Quality Assurance and Configuration Management.
- Design tools and equipment required.
- Prepare, review, comment, and approve calculations.

The following permits, laws, regulations, standards shall be considered a part of this project, whether or not they are expressly invoked. Codes, specifications, and standards shall apply to the extent applicable.

- NM 4890139088–TSDf, *Waste Isolation Pilot Plant Hazardous Waste Facility Permit*, with approved modifications
- DOE/WIPP-02-3214, *Remote-Handled TRU Waste Characterization Program Implementation Plan*, Current Version
- RH-TRAMPAC, *Remote-Handled Transuranic Waste Authorized Methods for Payload Control*
- CH-TRAMPAC, *Contact-Handled Transuranic Waste Authorized Methods for Payload Control*
- DOE-STD-1090-2001 - *DOE Standard - Hoisting and Rigging*

WIPP drawings and documents generated from this activity are the property of the DOE. Depending on contractual arrangements, design authority, and documentation may remain with the supplier.

Hazard Operability studies, review of Technical Safety Requirements (TSRs), engineering and administrative controls, and Unreviewed Safety Question (USQ) evaluations will be performed in accordance with WIPP or GEVNC procedures, as necessary.

9.0 PROCUREMENT AND MATERIALS MANAGEMENT

9.1 Subcontracting Strategy

WTS subcontracts a significant amount of the site work to vendors who own and operate the equipment at each Host site. In addition, numerous other subcontractors provide a wide array of services to support site projects, ranging from maintenance, construction, inspection and testing services, radiation control services, laboratory analyses, and supplies.

It is WTS's responsibility to develop and implement an overall subcontracting strategy that provides best-in-class companies delivering project completion at the most advantageous price. Key elements of this subcontracting strategy are to:

- Assign overlapping scopes of work among the subcontractors to ensure sufficient management, technical, and resource capabilities across the site and to foster a competitive contracting environment where high-performing subcontractors are rewarded with additional tasks as the project progresses.
- Review each major subcontractor to determine whether a make-buy analysis shall be performed.
- Increase the number of fixed-price and project-specific subcontracts as project activities become better defined and more predictable.
- Increase or decrease the volume of work assigned to specific subcontractors based on their performance and on the natural evolution of project activities.
- Continue to seek specialty subcontractors that can provide a service or technology to expedite cost-effective project completion.
- Incentivize subcontractors to provide high-quality, best-cost results, while accelerating the project schedules.

9.2 Procurement Systems

The WTS purchasing system is certified by the DOE as a Certified Purchasing System. The DOE performs system reviews periodically to ensure compliance with the Federal Acquisition Regulations (FAR) and DOE Acquisition Regulations (DEAR).

WTS operates in accordance with DOE-approved procedures implementing all aspects of procurement from sole source to source selection and vendor qualification.

Purchasing is performed in accordance with approved procedures. WTS maintains procurement staff who are Certified Purchasing Managers through the Institute of Supply Management.

9.3 List of Items Supplied by Client/Others

DOE will supply a trucking contractor for transport of the RH waste from GEVNC to the WIPP facility and CH waste to INL. Transportation of equipment for mobilization to GEVNC will be provided by WTS. The DOE will supply the shipping cask(s) and trailer(s).

The following contracts will be issued for procurement (if necessary):

- Radiological Control Technicians
- AB support services
- Subcontract Operators

9.4 Computer Requirements

Company or Clients Purchase Documents and Terms and Conditions

Procurement documents and Terms and Conditions are supplied in accordance with approved procedures.

9.5 Receiving/Warehouse Requirements

Receiving and warehouse requirements are provided through WTS-approved procedures. Receipt inspection at GEVNC will be performed under the certified CCP program.

9.6 Competitive and/or Sole Source Bidding Criteria

Criteria for Competitive and/or Sole Source procurements are determined by item complexity, market availability, and DEAR/FAR requirements standard for certified procurement systems. Approved procedures implement those requirements and criterion for use by qualified personnel.

9.7 Technical and Commercial Bid Evaluation Requirements

Bid evaluations are conducted in accordance with approval procedures. These include WP 15-PC3605, *Proposal, Competition, Identification, Selection, Evaluation, and Award*, and WP 15-PC3609, *Preparation of Purchase Requisitions*.

9.8 Sales Tax Requirements

Sales tax requirements are enforced in accordance with applicable state and federal law. WTS issues tax exempt certificates to suppliers for all materials and services consumed at the WIPP site or in the State of New Mexico.

10.0 PROJECT CONTROLS

The project control system seeks to be responsive to internal management requirements and provide WIPP participants with increased cost and schedule performance visibility of the accomplishment of project objectives. In addition to providing a formal integrated schedule and resource plan, the management control system provides analysis of planned versus actual performance and early detection or prediction of problems that require management attention.

In summary, the WIPP Project Control System provides for:

- Organization: Contractual efforts are established and responsibilities assigned for the work.
- Planning and Budgeting: Work is formally planned, scheduled, budgeted and authorized.
- Accounting: Cost of work and material is accumulated.
- Analysis: Planned and actual performance is compared and variances analyzed.
- Revisions and Access to Data: Estimates of final costs are developed along with methods to incorporate baseline changes in these estimates.

- Risk Management: Describes the WIPP risk identification, assessment, mitigation, and monitoring process.

The CBFO Office of Business is responsible for interpreting the requirements of the DOE/CBFO 03-3292, *CBFO Risk Management Plan*, as they apply to a particular program situation and for maintaining and updating this document, including coordinating changes with other project participants when appropriate.

The CBFO Baseline is actually comprised of three baselines that integrate the schedule, cost, and performance measures for the site. These baselines are as follows:

- Schedule Baseline: The Integrated Project Schedule is the primary controlled schedule from which schedule performance is measured. It is used to status and update summary level schedules. Only changes authorized through the Baseline Change Control process are incorporated into the schedule baseline.
- Cost Baseline: Contract funding levels, contained in the fiscal year program guidance letter from CBFO, plus approved changes, are allocated to Cost Account Plans, developed at Level 5 of the WBS, to form the cost baseline.
- Performance Measurement Baseline: The Performance Measurement Baseline (PMB) is the time-phased budget plan against which cost and schedule performance are measured. The resource-loaded schedule activities contained in the Complex-Wide Integration Tool form the basis of the PMB.

On a project of this scale, with its technical complexities and uncertain conditions, changes are inevitable. The magnitude and range of unknowns, as well as potentially changing regulatory requirements, necessitate identifying, implementing, and managing changes effectively. Cost and schedule baselines are generally controlled by the CBFO-95-1122, *Carlsbad Field Office Programmatic Change Control Process*, Current Version.

This PXP addresses the WTS scope, schedule, and budget for FY 2009 and FY 2010. Formal processes are established and documented in this PXP for communications, configuration control, and issues management. The PXP will be controlled by WTS to ensure that revisions are processed and approved by appropriate parties, that distribution is maintained, and that associated changes are maintained for record purposes.

11.0 PROJECT QUALITY PLAN

The requirements driving QA programs are specified in applicable federal and state regulations, orders, agreements, licenses, and waste shipping and acceptance criteria. QA program requirements affect every aspect of the project and emphasize planning, implementing, reporting, assessing, and improving, to ensure processes, items, or services meet the expectations of CCP customers.

The QA Program is a performance based program designed to ensure that the ten criteria of the Nuclear Safety Management 10 CFR 830.120 Subpart A, *Quality Assurance Requirements* (Rule), and the DOE Order 414.1, *Quality Assurance*, are met. The Rule applies to activities with the potential to cause radiological harm, while the Order applies to all other site activities. To meet these requirements, there is a QA Program for the site. A Quality Assurance Project Plan (QAPjP) will be utilized for CCP activities.

QA is a shared interdisciplinary function and responsibility. It involves management and individual contributions from all organizations responsible to produce items, perform activities, and independently verify that items and activities comply with specific requirements. Managers are responsible for knowing what requirements and standards to follow and for determining what criteria apply to the specific activities. Others demonstrate their responsibility by following procedures and notifying the appropriate supervision with actual or potential problems and helping to resolve these problems with approved corrective actions. All employees are responsible for complying with quality requirements. In a projectized organization, it is imperative that QA personnel support the goals of the project and still maintain an independence that will help ensure appropriately implemented QA program requirements. Within the CCP projects, QA personnel are specifically trained to assess work quality on a particular project.

QA inspection services shall include receipt and source inspection services through on-site qualified inspectors. Inspections shall be performed in accordance with applicable approved WIPP procedures including:

- WP 13-QA1003, *Quality Assurance Receipt/Source Inspections*
- WP 13-QA1002, *Visual Inspection*
- Other approved, specific procedures are applicable to the QA controls applied.

Nonconformance may be identified in accordance with WP13-QA3004, *Nonconformance Report*, if the subcontractor deficiency reporting system is not

utilized. Nonconforming items will be segregated and dispositioned in accordance with procedures.

12.0 CONSTRUCTION

12.1 Construction Management

Various WTS departments will provide needed support for planning, site preparation, material handling, performance of dry runs/mockups, validation of procedures, inspections/loading into Shipping Casks, and shipping.

Dry runs/mockups will be conducted in Carlsbad and/or GEVNC.

WTS will provide an operations superintendent/VPM to direct fieldwork. This individual has first line responsibility for the safety of the workers, protection of the environment, and compliance with applicable requirements. Workers will be provided as direct hire WTS employees and/or subcontracted workers.

WTS will be involved early in the planning process for performance of hazards analysis, subcontracting plans, participation in staffing decisions, coordination with project manager on GEVNC interface issues, review of engineering specifications/scopes for subcontracting, review of test plans, and participation in readiness activities.

WTS will develop plans and procedures for review by others, including (as necessary):

- Dry run/mock up plan
- Cask/canister loading operational procedures
- Job Hazards Analyses
- Work Packages
- Radiological Work Permits
- Authorization Bases
- Training matrix/qualification cards

12.2 Mobilization Plan

Equipment (if needed) and personnel will be mobilized to the GEVNC site in 2008. The equipment and facilities shall be set up and assembled as directed by WTS.

Waste handling operations will be coordinated with ongoing GEVNC activities. Movement of people and materials will be scheduled around

waste handling. There will be impacts with some GEVNC activities due to waste handling operations. These impacts will be minimized by close coordination and may involve some back shift work.

GEVNC will provide support services. These support services include radiation monitoring instrumentation for work areas, janitorial services, restrooms, laundry of reusable personal protective equipment, emergency response, and medical services.

12.3 Training

WTS is required to establish a training and documentation system. Employees shall be trained in hazard recognition, task training, emergency procedures, health and safety standards, conduct of operations and accident prevention, as required.

A training matrix will be developed with all training identified. Orientation of new WTS workers and subcontractors will be performed at GEVNC prior to starting work.

13.0 COMMISSIONING AND STARTUP

Following the decision to deploy the project equipment to GEVNC, the equipment must be prepared for mobilization and transported to GEVNC in an efficient and cost effective manner. Demobilization/mobilization and startup require extensive managerial coordination and logistical support both from within the Project Office and GEVNC. Proper packaging and preparation of equipment are required to prevent damage and to ensure the processes can be set up and calibrated in a timely manner at GEVNC. Key logistical functions include the following:

- Provide funding and up-front team support to the project.
- Develop and administer vendor subcontracts for services or equipment not provided by GEVNC.
- Develop and administer the subcontracts for development and maintenance of AK information.
- Develop and coordinate the review and approval of contractual and Interface Documents with the Host site to ensure clear roles and responsibilities and communication leads.
- Identify all site requirements for mobilization, equipment set up, calibration and startup, readiness for operation, full operations, and demobilization.

- Prepare, maintain, and update a detailed project plan, including implementation tasks and schedules.
- Manage and implement the mobilization and startup.
- Plan and conduct a Readiness Review (as required).
- Complete resolution of all findings and declare readiness.
- Obtain startup authorization and issue Startup Notification.

14.0 ENVIRONMENTAL, SAFETY, AND HEALTH

The safety targets for this project are zero lost time and zero recordable injuries. All injuries will be investigated and corrective actions taken to prevent other injuries.

Achieving successful project completion demands accelerating the full integration of safe work performance, effective safeguards and security, environmental stewardship, and quality into the management and performance of project work. WTS's primary objective is to deliver the project work scope with a best-in-class safety record. The successful integration of these compliance elements is vital for successful project completion.

Protecting the employees, the public, and the environment, while safeguarding the nuclear waste material, are key responsibilities that form the basis of operations. To help ensure project performance and compliance, standardized training of personnel in their specific project requirements and responsibilities is required.

14.1 Integrated Safety Management System (ISMS)

The DOE ISMS is an integrated approach to ensure that work is planned, analyzed, reviewed, approved, and executed in a safe manner and that safety is continuously improved through worker feedback. Five core functions of ISMS form the basis for working safety: 1) define the scope of work, 2) identify and analyze the hazards, 3) identify and implement controls, 4) do the work, and 5) provide feedback throughout the process. Safety accountability of WTS personnel is accomplished annually through performance measurements of safety and health objectives that have been mutually agreed upon by the employee and his or her supervisor or manager. Management Policy WTS MP 1.21, *Management Responsibility and Accountability*, states that managers must fully understand their responsibilities, and they will be held accountable for the activities conducted and decisions made within their areas of cognizance.

WP 12-IS.01, *Industrial Safety Program*, states "Every employee has the right and responsibility, without fear of reprisal from management or coworkers, to identify unsafe conditions, and if imminent danger exists, to stop work and report the hazard so the condition is corrected before proceeding". MP 1.2, *Work Suspension and Stop-Work Direction*, is the policy which empowers every employee onsite to cause the stoppage or suspension of activities to prevent imminent danger. WTS shall comply with all applicable federal and state laws and regulations and with all WTS rules and policy. This includes any applicable GEVNC requirements not already covered by the WIPP. A Job Hazard Analysis shall be prepared and submitted prior to each phase of work, as required. A Radiation Work Permit (RWP) will be prepared and reviewed by WTS and GEVNC personnel prior to each phase of work, as required. The appropriate as low as reasonably achievable (ALARA) organization will review the RWPs. WTS will prepare the appropriate work control documents before each task. WTS will conduct a pre-job meeting prior to each task and conduct a post-job analysis for lessons learned.

Certification activities are fully detailed and implemented via WTS procedures. These procedures were developed using ISMS principles. All non-characterization activities are controlled by Host site procedures and site work controls at GEVNC. Although these controls were developed using ISMS principles, they are likely to be unique and different than WIPP controls.

In addition, the project has an active lessons learned program to capitalize on experience gained from each activity and to continually improve safety performance.

14.2 Environmental Compliance

WTS will comply with governing regulations, agreements, and orders under the contract applicable to GEVNC. The specific criteria are defined in contractual documents (Statements of Work) and interface agreements between WTS and GEVNC. At a minimum, project activities have been, and will continue to be, evaluated for consistency with the Resource Conservation and Recovery Act (RCRA) and compliance with applicable water, air, waste, and natural resources requirements. National Environmental Policy Act (NEPA) values and requirements will be met through existing or separate decision-making processes.

All environmental, safety, and health reporting requirements are included in existing site procedures. WIPP procedures currently identify the reporting requirements for occurrences and events both planned and unplanned to comply with city, state, and federal requirements. Personnel

involved in specific activities where these requirements could be implemented, as well as general employees, are trained in how to comply with existing site procedures. In addition, the existing state Hazardous Waste Facility Permit contains specific reporting requirements that are implemented through approved WIPP procedures. Approved WIPP procedures will be followed to ensure compliance with all applicable city, state, and federal laws.

Specific precautions need to be identified and followed while working in a permitted RCRA storage area at GEVNC, as identified by GEVNC.

15.0 RISK MANAGEMENT PLAN

WTS managers involved in project execution participate in the identification and assessment of program risks. They review program documents, evaluate lessons learned, and use brainstorming and their own experience to identify risks. Project risks are identified in the following areas:

- Cost and Schedule
- Technical
- Programmatic (obtaining and utilizing resources outside the control of the program manager)
- Support
- Safety
- Regulatory/Permitting
- Site-specific (Including alternative site locations)

Once risks are identified, WTS categorizes the identified risks by probability and severity (consequences) of each event.

After risks have been identified and categorized, a risk management approach and mitigation actions are developed for each High and Medium risk. For Low risk elements not judged to require documented mitigation actions, WTS managers assure that they are controlled through the normal management functions and work processes. Risks and mitigation actions are identified in the CBFO Risk Management Plan, which is updated annually. In order to determine the effectiveness of the Risk Management Plan, the areas of Medium and High risks are monitored and statused during monthly program meetings with CBFO.

In addition, periodic reassessments of programs are performed to determine if new areas of risk need to be identified and assessed.

Specific risks associated with the GEVNC Removal Project include the following:

- The available information on the RH waste may not be sufficient to support AK and subsequent certification of the waste to WIPP requirements. Mitigation includes performing a thorough review of documentation; interviewing existing/past GEVNC employees; performing tests, where required, to fill in data gaps and conducting site reviews. Early AK determinations will be required.
- GEVNC site problems or severe weather may significantly impact project schedule. Mitigation includes close coordination with GEVNC management to provide timely information for contingency planning and possible task recovery. Detailed planning, including mockups and dry runs, will be required to ensure retrieval and loading operations are conducted as efficiently as possible.
- Potential personnel radiation exposure. Mitigation includes ensuring that the radioactive content of the RH waste is known at the time of storage. The very nature of the work will involve great care to minimize worker radiation exposure to ALARA by remote operations, reduced time, and shielding where required. All radioactive work will involve detailed planning, a RWP, field dry runs, and adequate radiation control oversight.

16.0 PROJECT CLOSEOUT

The RH Program is expected to continue beyond 2012 providing characterization and shipping services throughout the DOE Complex. No closeout activities are planned at this time for the certified program. However, the end of the GEVNC RH Removal Project is scheduled to be completed by 2010. Closeout of the project, including compliant storage and audit of final certification records, will be conducted.

17.0 PROJECT PROCEDURES

The Document Control organization under CCP provides full-time, subcontracted, document services. These services include completing Site Interface Agreements, Program Documents, Quality and Technical Procedures, Statements of Work, Electronic Forms, and participation in CCP audits. The Document Services Support Team performs document control and technical and operating support for the CCP. The Support Team provides support by creating, modifying, and controlling documents and electronic forms in accordance with applicable requirements. Support includes:

- Coordinating reviews for documents.
- Maintaining a hard copy/master file of active controlled documents, including review and approval records.
- Maintaining the Electronic Document Management System. The system provides electronic review, approval, and distribution of controlled documents.
- Supporting audits, assessments, surveillances, and reviews as required by WTS.

CCP Records provides records management and support services to the CCP. The CCP Records Center is located at the Skeen Whitlock Building in Carlsbad, New Mexico. All records generated during the characterization processes are transmitted to and maintained at the Records Center. Records generated for the GEVNC Removal Project will also be stored in Carlsbad.

CCP Records Center personnel act as Records Custodians in support of all generator facilities. Records Inventory and Disposition Schedules are created and maintained annually for the CCP Project Office and all CCP generator facilities performing characterization operations. Records functions include: 1) record receipt, acknowledgment, and maintenance; 2) records scanning, tracking, and retrieval; 3) audit, assessment, and surveillance support; and 4) tracking and coordinating site-specific records training.

In addition, CCP Records maintains records custodians at remote generator facilities. These individuals support the in-process and/or completed records at each facility for transmittal to the CCP Records Center.