

WP 12-10  
Revision 1

# WIPP Incident/Accident Response Team Plan

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**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

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**TABLE OF CONTENTS**

ACRONYMS AND ABBREVIATIONS . . . . . iii

1.0 INTRODUCTION . . . . . 1

    1.1 Purpose . . . . . 1

    1.2 Scope . . . . . 1

    1.3 Concept of Operations . . . . . 1

2.0 NOTIFICATIONS AND COMMUNICATIONS . . . . . 2

    2.1 On-Call Notification Lists . . . . . 2

    2.2 Team Membership List . . . . . 2

    2.3 Identification Cards . . . . . 3

    2.4 IART Activation . . . . . 3

    2.5 Team Members Personal Notification . . . . . 3

3.0 TEAM MANAGEMENT AND ACCOUNTABILITY . . . . . 3

    3.1 Team Structure . . . . . 3

    3.2 Selection of Team Members . . . . . 4

        3.2.1 Packaging Engineer Requirements . . . . . 4

        3.2.2 Transportation Engineer Requirements . . . . . 5

        3.2.3 Public Information Officer Requirements . . . . . 5

    3.3 Team Member Security and Identification Requirements . . . . . 5

    3.4 Team Member Duties and Responsibilities . . . . . 6

        3.4.1 Team Leader . . . . . 6

        3.4.2 External Emergency Management IART Coordinator . . . . . 6

        3.4.3 Packaging Engineer . . . . . 6

        3.4.4 Transportation Engineer . . . . . 7

        3.4.5 Public Information Officer . . . . . 7

4.0 TEAM TRAINING AND EXERCISES . . . . . 7

5.0 REPORTS AND RECORDS . . . . . 8

    5.1 Response Records . . . . . 8

    5.2 Response Records Retention . . . . . 8

    5.3 Training Records . . . . . 9

    5.4 Other Records . . . . . 9

    5.5 Quality Records Identified . . . . . 9

6.0 RESPONSE PROTOCOL . . . . . 9

    6.1 Initial Meeting . . . . . 9

    6.2 Travel Arrangements . . . . . 9

    6.3 Personnel Selection for Response . . . . . 10

    6.4 Payment for Goods and Services on Responses . . . . . 10

    6.5 En Route and Scene Communications . . . . . 10

7.0 EQUIPMENT CONTROL . . . . . 11

    7.1 Equipment Requirements and Selection . . . . . 11

    7.2 Equipment Accountability . . . . . 11

**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

---

8.0 SOFTWARE CONTROL ..... 11

9.0 REFERENCES ..... 12

**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

---

**ACRONYMS AND ABBREVIATIONS**

CBFO	Carlsbad Field Office
CMRO	Central Monitoring Room Operator
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
IART	Incident/Accident Response Team
NRC	U.S. Nuclear Regulatory Commission
PE	Packaging Engineer
PIO	Public Information Officer
RIDS	Records Inventory and Disposition Schedule
TE	Transportation Engineer
TRU	transuranic
WIPP	Waste Isolation Pilot Plant
WIPPTREX	WIPP Transportation Exercise (program)
WTS	Washington TRU Solutions LLC

# WIPP Incident/Accident Response Team Plan

## WP 12-10, Rev. 1

---

### 1.0 INTRODUCTION <sup>1</sup>

#### 1.1 Purpose

The Incident/Accident Response Team (IART) established within the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) provides off-site transportation related emergency response capabilities for the protection of the public and the environment, the recovery of CBFO assets, and the rapid field resolution of transportation incidents/accidents involving any transuranic (TRU) waste packaging/package used by the CBFO. The purpose of this plan is to establish the CBFO and Washington TRU Solutions LLC (WTS) roles, responsibilities, and quality and safety controls for the personnel, materials, equipment, and processes of the CBFO IART. This plan implements the requirements and direction of the following documents:

- DOE Order 151.1B, *Comprehensive Emergency Management System*
- DOE M 460.2-1, *Radioactive Material Transportation Practices Manual*
- DOE/CBFO 94-1012, *Carlsbad Field Office Quality Assurance Program Document*
- DOE/CBFO 98-3103, *Waste Isolation Pilot Plant Transportation Plan*

#### 1.2 Scope

This plan applies to the function of IART members as they procure and maintain equipment, select and train members, maintain records, and respond to transportation emergencies involving any aspect, package, or mode of the Waste Isolation Pilot Plant (WIPP) transportation system, and the programmatic management by the CBFO and WTS of this vital response asset.

#### 1.3 Concept of Operations

The IART is a CBFO program, administered by WTS, for the purpose of providing expertise in packaging and transportation to safely expedite the recovery of any Type B transuranic (TRU) waste package involved in an incident/accident. The IART functions as an emergency response asset of the CBFO and receives programmatic and functional direction from CBFO management during emergency responses. The on-call CBFO Transportation Management Team is comprised of three to four individuals on a rotating on-call schedule. The on-call CBFO Transportation Manager is the IART Team Leader. The IART will have two to three alternate members who will respond in the event of an incident/accident.

The IART consists of voluntary members selected from CBFO and WTS employees for their expertise in leading the IART, packaging engineering, transportation engineering, and public affairs as appropriate. WTS External Emergency Management staff provides the administrative duties to maintain the readiness of the team. These duties include

**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

---

| maintaining the IART equipment, conducting training, maintaining records, and other  
| duties necessary to ensure the readiness posture of the team.

The primary function of the IART is to ensure the safe and uneventful recovery of any package with safety and protection of the team members, emergency responders, the public, and the environment taking priority over all other considerations.

| The team will accomplish its primary function by assisting and advising the shipper and  
| the Incident Commander in evaluating the integrity of the TRU transport systems that  
| may have been involved in an accident or incident in transit. The information generated  
| by the team is given to the shipper and the Incident Commander, or the authority having  
| jurisdiction, for their use in decision making related to the recovery of the packages.  
| The team is available to make recommendations to the Incident Commander, or  
| authority having jurisdiction, for the recovery of the package(s) and in the dissemination  
| of information to the emergency responders, public, media, and elected officials. The  
| IART will not engage in cleanup or recovery operations of any package other than  
| Type B TRU waste packages.

| Except in situations where, due to the classified nature of the materials or the  
| circumstances of the incident, the accident/incident scene has been declared a National  
| Security Area under the provisions of the Atomic Energy Act of 1954 (*42 United States  
| Code §§2011-2259*), the team will operate under the Incident Command system of the  
| jurisdiction having authority of the incident/accident scene. In the event there is a  
| declaration of a National Security Area, the team will operate under the jurisdiction of  
| the lead federal agency's on-scene commander.

**2.0 NOTIFICATIONS AND COMMUNICATIONS**

**2.1 On-Call Notification Lists**

| On a semiannual basis, the IART Team Leader will prepare a list of the IART members  
| that will be on-call for a given period. The list will include, at a minimum, the name of  
| each team member and a telephone number at which they can be reached at all times  
| while they are on-call. Only fully qualified team members will be listed on the on-call  
| list.

| A list of the basic IART competencies for all members can be found in Section 4.0.

**2.2 Team Membership List**

The Team Leader will provide a copy of the team membership list to all IART members. A record copy of the current list will be maintained in a fireproof cabinet in an IART communications folder.

## **WIPP Incident/Accident Response Team Plan WP 12-10, Rev. 1**

---

### **2.3 Identification Cards**

The Team Leader is responsible for issuing to each team member a quick reference card with the last known telephone and pager numbers for each team member or method of notifying them for response. A copy of this card will be maintained in the IART communications folder. The contents of this folder will be reflected in the current External Emergency Management Records Inventory and Disposition Schedule (RIDS).

The Team Leader is responsible for issuing special personalized IART member identification cards to all members of the team. These "badges" will be worn like the typical site security pass for identification to law enforcement and emergency management personnel at a transportation accident scene. These cards are similar in shape and size to the site security pass, including photograph, but the site-issued DOE security pass is not to be used as a public identification device. These identification cards will be held in the response kits at the Skeen-Whitlock Building so as to always be readily available for response.

### **2.4 IART Activation**

When the need for the IART arises, the IART Team Leader will contact the Central Monitoring Room Operator (CMRO) to activate the WIPP IART. The CMRO will then page the IART members on the established paging system for activation instructions. Requests for IART response or assistance received directly from any outside civil or federal agency will be referred to the IART Team Leader. All requests for response of the WIPP IART must be approved and directed by the CBFO on-call DOE Transportation Manager who is the IART Team Leader.

### **2.5 Team Members Personal Notification**

All team members will be issued a communications device (i.e., pager, cell phone) that will be activated by the CMRO when activation of the IART is required. The paging system can transmit only in the Carlsbad radio transmission area. During activation through the paging system, a prerecorded message will be transmitted automatically to the IART members' communication devices and home telephones instructing the IART members to respond. This pager and telephone alert system will be tested during drills/exercises, and periodically as requested by the IART Team Leader in accordance with the CMRO procedures for testing of radio alerting systems.

## **3.0 TEAM MANAGEMENT AND ACCOUNTABILITY**

### **3.1 Team Structure**

The team shall consist of four members which will include:

- Team Leader, who should be a CBFO employee. In extraordinary circumstances, a contractor employee may act in this position until relieved by a federal employee.

**WIPP Incident/Accident Response Team Plan**  
**WP 12-10, Rev. 1**

---

- Public Information Officer (PIO) can be a CBFO employee or a contractor employee.
- Transportation Engineer(s) (TE), contractor employee
- Packaging Engineer(s) (PE), contractor employee

The on-call DOE Transportation Manager is the IART Team Leader. This individual is part of the CBFO TRU Waste Logistics Team in the Characterization and Transportation Department.

**3.2 Selection of Team Members**

Only individuals that meet the required training and experience requirements will be allowed participatory membership on the IART. The selection of each member is made by their manager and is based on their current job expertise, training, education, and competency to serve in the specific position on the team.

For WTS members, the individual's manager must send a memo or e-mail to the manager of External Emergency Management stating that the individual being appointed or volunteering for the IART is qualified for the position for which they are applying. Management approval indicates that the manager believes that the individual can fulfill the obligations of the position in which they wish to serve. Anyone wishing to become a member of record on the team must complete the additional training found in Section 4.0 prior to participating in any response or exercise. There is no "in training" or "partially qualified" category or status of team members. Only fully trained and qualified individuals are considered members of the response team. A record of qualification typically will consist of the individual's training records maintained by the Technical Training Section of WTS Human Resources at WIPP, and the memo or e-mail from the manager of each member, maintained in the External Emergency Management IART files and reflected in the approved RIDS.

**3.2.1 Packaging Engineer Requirements**

The IART PE must have a minimum of 12-months' work experience and a bachelor's degree in a related field with an emphasis in specialty area. A combination of education and related job experience is acceptable if the relevant knowledge, skills, and abilities have been adequately demonstrated for the position. The PE must have extensive knowledge of drawings and basic construction of all TRU waste packages and their Certificates of Compliance; Safety Analysis Reports; and Operating and Maintenance procedures. Additionally, the PE must have Incident Command-100 and HAZMAT Awareness training (in accordance with 29 CFR §1910.120, "Hazardous Waste Operations and Emergency Response"), and must be familiar with this plan.

**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

---

**3.2.2 Transportation Engineer Requirements**

The IART TE must have a minimum of 12 months' work experience and a bachelor's degree in a related field with an emphasis in specialty area. A combination of education and related job experience is acceptable if the relevant knowledge, skills, and abilities have been adequately demonstrated for the position. The TE must maintain the following qual cards:

- TE-01, Radioactive Materials Transportation
- TE-02, Federal Motor Carriers Safety Regulations
- TE-03, Hazardous Materials
- TE-05, Hazardous Waste Shipment by Public Highway

Additionally, the TE must have Incident Command-100 and HAZMAT Awareness training (in accordance with 29 CFR §1910.120), and must be familiar with this plan.

**3.2.3 Public Information Officer Requirements**

The IART PIO must have a minimum of 12-months work experience in the field of Public Relations and a bachelor's degree or equivalent qualifications in related communication fields. A combination of education and related job experience is acceptable if the relevant knowledge, skills, and abilities have been adequately demonstrated for the position. The PIO must, as a part of regular job responsibilities, be professionally qualified and experienced, and authorized by the CBFO to directly interact with the public and media, produce news releases and other communication products, and address stakeholders about WIPP operations and the associated transportation program. For qualification, the PIO also must have general knowledge of public and media affairs' principles, practices and techniques, be familiar with WIPP emergency public information procedures and complete the following emergency public information training requirements: Joint Information Center-100 Training, and the DOE EPI Spokesperson and Media Training (or equivalents); Incident Command-100 Training, HAZMAT Awareness Training. The PIO also must be familiar with this plan.

**3.3 Team Member Security and Identification Requirements**

A standard DOE security access badge and a CBFO IART identification badge are required for all active members of the team. The CBFO IART identification badge will be worn at the scene of an incident/accident and is used to identify the individual as a member of the IART to local responders. The DOE security badge identifies an individual as a federal or contractor employee and the type of security clearance (Q or L), and is used to allow DOE and WTS employees access to other DOE facilities if a TRU waste package(s)/packaging(s) involved in an incident/accident require movement to another DOE facility.

## **WIPP Incident/Accident Response Team Plan**

### **WP 12-10, Rev. 1**

---

### **3.4 Team Member Duties and Responsibilities**

Specific duties, accountabilities, and responsibilities are listed below. These are not all-inclusive in all situations.

#### **3.4.1 Team Leader**

- Advise the External Emergency Management Coordinator of any equipment or supply needs for the position.
- Coordinate with the U.S. Department of Transportation (DOT), U.S. Nuclear Regulatory Commission (NRC), and other applicable regulators as required.
- Coordinate and resolve issues with the affected state and tribal governments related to the movement of damaged packages.
- Assume the overall safety responsibility for all team members.
- Act as the primary federal point of contact for the recovery of the package(s).

#### **3.4.2 External Emergency Management IART Coordinator**

- Maintain an inventory of response equipment used or required by the team.
- Schedule and conduct required training.
- Arrange for or conduct required drills and exercises for the team.
- Maintain the records noted in this document in accordance with the approved RIDS.
- Annually review this plan and the upper-tier documents to ensure that baseline documents are applicable, correctly listed, and current.
- Ensure that replacement supplies are ordered for expended or expired supplies and that they are placed in a state of readiness.
- Ensure that the IART paging system is maintained in accordance with the membership list.

#### **3.4.3 Packaging Engineer**

- Ensure that appropriate and up-to-date information about the various TRU packages are maintained in the software and hard copy information that is transported by the team to the incident/accident scene.
- Coordinate and resolve issues with the NRC-related to a damaged package.

## **WIPP Incident/Accident Response Team Plan WP 12-10, Rev. 1**

---

- Advise the External Emergency Management Coordinator of any equipment or supply needs for the position.

### **3.4.4 Transportation Engineer**

- Ensure that appropriate and up-to-date information about the various transportation systems (e.g., trailers, tractors, special components) are maintained in the software and hard copy information that is transported by the team to the incident/accident scene.
- Ensure that adequate transportation related supplies, such as blank shipping papers, labels, and placards, are provided to the External Emergency Management Coordinator for inclusion in the response kits.
- Coordinate and resolve issues with the DOT related to the movement of damaged packages.
- Advise the External Emergency Management Coordinator of any equipment or supply needs for the position.

### **3.4.5 Public Information Officer**

- Ensure that public information materials, photos, prepared news release material, and media information packets are current and accurate.
- Ensure that adequate PIO-specific supplies are provided to External Emergency Management Coordinator for inclusion in the response kits.

## **4.0 TEAM TRAINING AND EXERCISES**

Unless otherwise stated in this plan, the basic training requirements for each team member's position is the same for the function of participating on the team. Individual training requirements to perform specific tasks, such as being a public spokesperson or PIO, TE, or PE, is inclusive in the normal job description of each team member.

**WIPP Incident/Accident Response Team Plan  
WP 12-10, Rev. 1**

---

The basic IART competencies for all members are:

TRAINING	FREQUENCY
1. IART Plans and Procedures	Initial assignment to team and after each change to document
2. Participation in WIPPTREX <sup>1</sup>	Once every two years
3. IART Specific Equipment	Initial training and after each change to job-specific equipment
4. HAZMAT Awareness - 29 CFR §1910.120 (p)6 <sup>2</sup>	Initial training and refresher once every two years
5. Full-Scale Field Recovery	Initial training for each package
6. Incident Command Course	Initial training and refresher once every two years

<sup>1</sup> WIPPTREX - WIPP Transportation Exercise (program)

<sup>2</sup> Title 29 *Code of Federal Regulations* §1910.120

Note: Participation in a WIPPTREX involving recovery of a package includes 1, 2, 3, 5 and 6 above. "Initial" means during the initial training and qualification period for a new team candidate. When new equipment is procured or assigned to the team, the individual team member(s) will be trained on the use of the equipment by the External Emergency Management Coordinator, and the training will be documented.

WIPPTREX exercises are conducted in various parts of the country each year. Each team member is required to attend at least one exercise every two years in which a recovery of a package is part of the scenario. In the event there are no exercises scheduled in that two-year period, each member is required to participate in a recovery exercise coordinated with, and using, an area crane contractor.

All required training for the team will be coordinated by the External Emergency Management Coordinator.

**5.0 REPORTS AND RECORDS**

**5.1 Response Records**

Formal responses require the preparation of a log of events. This report is a narrative describing, at a minimum, general information gathered, actions taken, observations or findings, recommendations, lessons learned, members names and duty assignments, issues raised, and problems encountered.

**5.2 Response Records Retention**

Retention of records of IART responses may be in one of two forms:

- If the response was conducted exclusively by the IART, all of the records will be completed and retained by External Emergency Management in accordance with the approved RIDS.
- A response may be of a classified nature. Classified reports, information, or records will not be maintained by External Emergency Management. A letter to file will be prepared and placed in the Response Records section of the files, as reflected in the approved RIDS, explaining where the records may be found. The

## **WIPP Incident/Accident Response Team Plan**

### **WP 12-10, Rev. 1**

---

letter to file will contain only unclassified information related to the response and the location of the classified information.

### **5.3 Training Records**

All training records will be maintained in the individual team members' training files in the Technical Training Section of WTS Human Resources at the WIPP site. This will include any documentation of off-site, remote, formal, initial, refresher, on-site, exercise, drill, and informal training received relative to the IART function.

### **5.4 Other Records**

Other records required to be retained are defined in the approved RIDS and include exercises and drill reports, IART budget information, personal equipment issuance (if required), general correspondence, and the required reading.

### **5.5 Quality Records Identified**

The following records have been identified as quality records. The External Emergency Management Section is responsible for having all quality records properly documented on their approved RIDS.

- Log of Events
- Team member qualifications
- Letters to file explaining where report is located (see Subsection 5.2)
- Quarterly inventory of IART equipment
- Screening Checklist, EA16-2-1-0

## **6.0 RESPONSE PROTOCOL**

### **6.1 Initial Meeting**

After initial notification, the Team Leader and members will confer and determine how many team members will be required to respond and where the team will meet for an initial situation briefing and response strategy planning. This meeting will be at the Skeen-Whitlock Building since the majority of equipment, supplies, and vehicles for the IART are located there.

### **6.2 Travel Arrangements**

Based on the location, weather conditions, time of the day and week, number of members responding, amount of equipment that needs to be moved, and urgency of the incident, a determination will be made on the best way to travel to the incident scene. Options include all or part of the team responding in vehicles, or all or part of the members responding by commercial or charter aircraft. The CBFO will make arrangements for DOE contractor or charter aircraft. Commercial flights will be arranged for in the manner currently approved for any business travel. Deviation from

## **WIPP Incident/Accident Response Team Plan**

### **WP 12-10, Rev. 1**

---

standard travel protocols, procedures, or policies must be approved by senior WTS management or Financial Services for WTS employees. CBFO-assigned government vehicles will be used in the event the situation is close (typically 250 miles or less) to WIPP.

Travel arrangements for CBFO employees will be in accordance with applicable CBFO directives and DOE Orders and procedures.

### **6.3 Personnel Selection for Response**

At a minimum, the Team Leader must be a member of all responses. Additional team members will be assigned to respond depending on the incident/accident conditions. The Team Leader is responsible for determining the configuration of a response team and for assigning individual responsibilities.

### **6.4 Payment for Goods and Services on Responses**

Payment for per diem items and travel expenses (e.g., rental cars, airlines, lodging, etc.) will be in accordance with the approved per diem rates for government travel and agreements with rental car companies and others. Deviation from standard travel protocols, procedures, or policies must be approved by senior WTS management or Financial Services for WTS employees. Purchases of small items needed to perform work, provide for the safety of the team, or reasonably accommodate the functional needs of the team, may be made with credit cards or cash (with receipt) and upon return filed for reimbursement in accordance with the current limitations and authority for such purchases in WP 15-PC3043, Request for Remittance.

Remittance of expenses incurred by CBFO employees will be in accordance with applicable CBFO directives and DOE Orders and policies.

### **6.5 En Route and Scene Communications**

Cellular telephones, pagers, and specific handheld two-way radios are provided for the team's use en route to and at the scene of a transportation incident. Communications between the scene and outside coordination offices (the CBFO, WTS, and the carrier) are essential for the safety of the team and the timely dissemination of information and for notifications and the reporting of the team status and scene conditions to management.

The handheld, two-way radios may be used in any location along the transportation routes as long as they conform to the regulatory requirements of the Federal Communications Commission. A team member must telephone the Contract Spectrum Manager, DOE Nevada Field Office, and report that the WIPP IART is being deployed and advise them of the geographical location in the United States where the radios will be used. The Contract Spectrum Manager will ensure that the operation of the radios will not interfere with other radio systems or frequencies in the area of proposed operation and advise the team of what frequency to operate on.

**WIPP Incident/Accident Response Team Plan**  
**WP 12-10, Rev. 1**

---

Complete written instructions on this process, including frequency and radio type information, telephone numbers to contact Nevada Field Office 24 hours a day, and required system reference number (code) are maintained in the communications kit, with the radios, at the Skeen-Whitlock Building.

It is the responsibility of the Team Leader to ensure that the CMRO is aware of the operational telephone or pager number through which the team can be contacted.

The use of government communications equipment is to be limited to official business purposes only.

The Team Leader is responsible for establishing communications with the CBFO and keeping them advised of the status of the response.

The Team Leader will ensure that adequate communications equipment is taken on each response to allow all members of the team to keep informed of actions to be taken and safety issues at the scene.

## **7.0 EQUIPMENT CONTROL**

### **7.1 Equipment Requirements and Selection**

Equipment selected and maintained by the team is based on needs assessments from training, exercise participation, and lessons learned in actual responses. There is no IART equipment requirement established in any other document. The External Emergency Management Coordinator will inventory quarterly all equipment owned by and available to the IART and verify that the equipment meets the capability requirements in effect at that time. If it is found that certain equipment must be replaced, upgraded, deleted, or new equipment procured, it is the responsibility of the Team Leader to direct appropriate corrective action.

### **7.2 Equipment Accountability**

All IART equipment that meets the accountability requirements of WP 15-PM.01, Property Management Program, will be appropriately tagged and entered into the property control and accountability systems as required. The records custodian will be the manager of External Emergency Management.

## **8.0 SOFTWARE CONTROL**

A screen of the software used by the IART was conducted in accordance with WP 16-2, Software Screening and Action Plan. The software used by the IART is for encrypting two-way radios, software for Sony digital camera, and previously screened software such as Microsoft. The screen found that this software did not meet the criteria described in WP 16-2. The resulting screen was filed in accordance with External Emergency Management approved RIDS.

**WIPP Incident/Accident Response Team Plan**  
**WP 12-10, Rev. 1**

---

**9.0 REFERENCES**

Atomic Energy Act of 1954, 42 *United States Code* §§2011-2259

29 CFR §1910.120, "Hazardous Waste Operations and Emergency Response"

DOE M 460.2-1, *Radioactive Material Transportation Practices Manual*

DOE Order 151.1B, *Comprehensive Emergency Management System*

DOE/CBFO 94-1012, *Carlsbad Field Office Quality Assurance Program Document*

DOE/CBFO 98-3103, *Waste Isolation Pilot Plant Transportation Plan*

WP 15-PC3043, Request for Remittance

WP 15-PM.01, Property Management Program

WP 16-2, Software Screening and Action Plan

| EA16-2-1-0, Screening Checklist