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WP 12-ER.02
Revision 4

WIPP Vital Documents Protection Program

Cognizant Section: Emergency Management

Approved by: Robert Paslay

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CHANGE HISTORY PAGE		
Revision No.	**Date Issued**	**Description of Changes**
4	10/13/10	Editorial revision to remove the reference to Attachment F of the HWFP and update reference numbers.

1.0 PURPOSE [1]

The Waste Isolation Pilot Plant (WIPP) Vital Documents Protection Program Plan describes the WIPP Vital Documents Protection Program in accordance with the requirements in Title 36 *Code of Federal Regulations* (CFR) Part 1236, "Management of Vital Records." The program provides identification and protection of vital documents (those documents needed for the continuity of operations before, during, and after emergencies) and describes the provisions that ensure the protection, control, and availability of documents considered essential to controlling emergency responses, recovering from an emergency, or continuing facility operation following an emergency.

2.0 SCOPE

The requirements of this program apply to those documents designated as emergency operating documents by Emergency Management. The program describes the requirements and guidance used for identifying, collecting, maintaining, controlling, protecting, and storing emergency operating documents to ensure that they are immediately available to support emergency conditions.

3.0 DEFINITIONS

The following definitions apply to the WIPP Emergency Operating Documents Protection Program:

Emergency Operating Documents - Duplicate copies or indexes of original records identified as essential to the continued functioning or reconstitution of an organization during and after an emergency. Included are emergency plans and directives, orders of succession, delegations of authority, staffing assignments, and selected program documents needed to continue the most critical agency operations, as well as related policy or procedural documents that assist staff in conducting operations under emergency conditions, and in resuming normal operations after an emergency.

This definition is based upon the definition in 36 CFR Part 1236 for Emergency Operating Records. However, since these documents are guidelines or copies of procedures, they do not meet the WIPP definition of "records." The original "record" is still maintained by the cognizant departments.

Emergency - Event or condition that represents a significant degradation in the level of safety or security at a site/facility and that requires time-urgent response.

Emergency Operations Center (EOC) - The EOC functions as support to the Facility Shift Manager (FSM) to provide assistance in the decision-making process during an emergency situation. The EOC may be activated by the FSM. The WIPP EOC is located in the Safety Building.

Alternate Emergency Operations Center (AEOC) - WIPP operates an AEOC off-site in the Skeen-Whitlock Building in Carlsbad, New Mexico. The AEOC serves as an alternative location for the EOC.

Vital Documents Coordinator - The individual designated by the manager of Emergency Management who is responsible for implementing, coordinating, and maintaining the WIPP Vital Documents Protection Program.

Vital Documents - Documents essential to continued functioning or the reconstitution of an organization before, during, and after an emergency and also those records essential to protecting the rights and interests of that organization and of individuals directly affected by its activities. Vital documents considerations are part of the WIPP's records disaster prevention and recovery program.

Q&MIS - The WIPP electronic document control system.

4.0 GENERAL

4.1 Responsibilities

4.1.1 Emergency Management

The manager of Emergency Management is responsible for the following:

- Implementing, coordinating, and maintaining the WIPP Vital Documents Protection Program
- Appointing one or more staff members to serve as the Vital Documents Coordinator
- Ensuring the documents selected are kept current, complete, and accessible
- Ensuring an annual review of the adequacy of the WIPP Emergency Operating Documents Protection Program is completed

4.1.2 Vital Documents Coordinator

The Vital Documents Coordinator is responsible for the following:

- Maintaining copies of documents identified as Emergency Operating Documents (see Attachment 1, Emergency Operating Documents Index)
- Updating the Emergency Operating Documents Index (Attachment 1) whenever documents are added or deleted, or when information related to the plan changes

- Interfacing with Project Records Services and Washington TRU Solutions LLC (WTS) to resolve emergency operating documents issues

4.1.3 Cognizant Organizations

Cognizant organizations are responsible for the following:

- Providing a copy of the emergency operating document to Emergency Management

- Updating the emergency operating record when revised by supplying Emergency Management with the revision

- Interfacing with Vital Documents Coordinator to resolve emergency operating document issues

4.2 Identifying Emergency Operating Documents

When identifying those WIPP procedures or guidelines which are essential to emergency response and management, sound judgment should be exercised to keep the volume of documents at a manageable level. Site record copies of items are still maintained by the generating section and documents are disposed of in accordance with the appropriate Records Inventory and Disposition Schedule (RIDS).

Documents required to support post-emergency investigations and recovery are not required on an immediately available basis. Those documents remain in regular records storage until required.

Attachment 1 will be maintained by the Vital Documents Coordinator and provides descriptions of the emergency operating documents and the locations where they are stored.

4.3 Collection and Maintenance of Emergency Operating Documents

The Q&MIS system is used to maintain and control electronic copies of plans and procedures. In the event the Q&MIS is disabled, controlled copies of the plans and procedures are available in hard copy. In addition, the FSM has access to the WIPP Site Library Controlled Document Location (maintained by Document Services).

Emergency operating documents that are collected from the originators or current custodians will be maintained as current and complete as described in Attachment 1. Only the most current documents will be used as superseded documents are dispositioned when they are replaced in accordance with WP 15-PR, Records Management Plan.

4.4 Control and Storage of Emergency Operating Documents

Emergency operating documents shall be immediately accessible for use. The documents are stored in a manner which affords control and a heightened level of fire protection, as follows:

- Documents are available in the WIPP EOC.
- Original document records are filed, stored, and controlled in accordance with WP 15-PR.
- Duplicate documentation is maintained as identified in Attachment 1.

4.5 Reviews

The adequacy of the WIPP Emergency Operating Documents Protection Program shall be reviewed, at a minimum, annually. Program elements to be reviewed annually include:

- Ensuring that document storage and control are adequate at both the primary and alternate storage locations
- Ensuring that documents are complete and updated
- Ensuring that the Vital Documents Protection Program is up-to-date and accurate

5.0 REFERENCES

Title 36 CFR Part 1236, "Management of Vital Records"

WP 15-PR, Records Management Plan

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Attachment 1 - Emergency Operating Documents Index

EMERGENCY OPERATING DOCUMENTS INDEX				
Cognizant Organization	**Document Number and/or Revision Number or Date**	**Description**	**Primary Location**	**Secondary Location**
WRES Environmental Compliance	NM4890139088	RCRA Contingency Plan	EOC	CMR
Emergency Management	WP 12-ER	Emergency Response Procedures	EOC, CMR	Alternate EOC
Emergency Management	WP 12-9	WIPP Emergency Management Program	EOC	Alternate EOC
Environmental Monitoring and Hydrology	DOE/WIPP-99-2194	Environmental Monitoring Plan	EOC via Q&MIS; WIPP Site Library	Skeen/Whitlock Bldg. Library
Industrial Safety	WP 12-IS.01	Industrial Safety Program	EOC via Q&MIS; WIPP Site Library	Skeen/Whitlock Bldg. Library
Nuclear Safety	DOE/WIPP-07-3372	WIPP Documented Safety Analysis	EOC	WIPP Site and Town Library
Emergency Management	DOE/WIPP-08-3378	WIPP Waste Handling Emergency Planning Hazards Assessment	EOC	Q&MIS
Emergency Management	WP 12-RP.01	Emergency Planning Hazards Survey of the DOE WIPP Report	EOC	Q&MIS
Document Services	Management & Operating (M&O) Procedures	M&O Procedures	EOC via Q&MIS	WIPP Site and Town Library

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EMERGENCY OPERATING DOCUMENTS INDEX				
Cognizant Organization	**Document Number and/or Revision Number or Date**	**Description**	**Primary Location**	**Secondary Location**
Eddy County	Latest Version	Eddy County NM Emergency Operating Procedures	EOC	Eddy County Emergency Management
City of Hobbs	Latest Version	City of Hobbs, NM Disaster Plan	EOC	Lea County Emergency Management
Emergency Management	Latest Versions	Memorandums of Understanding with outside agencies	EOC	DOE/CBFO Contracting Office
Security	Latest Version	Security Plan	EOC	Guard & Security Building Bldg. #458
Security	Latest Version	Protective Force Orders	EOC	Guard & Security Building Bldg # 458
Security	Latest Version	Security Contingency Plan	EOC	Guard & Security Building Bldg # 458
Emergency Management	Latest Version	On-Call List	EOC; CMR	Guard & Security Building Bldg # 458
Engineering	Latest Version	Engineering Change Orders	Engineering File Room (accessible by Facility Shift Manager)	Project Records Services[1] - CBFO Records Storage Facility

[1] There may a one- to two-month delay in delivering copies of Engineering Change Orders to Project Records Services.

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Attachment 1 - Emergency Operating Documents Index

EMERGENCY OPERATING DOCUMENTS INDEX				
Cognizant Organization	**Document Number and/or Revision Number or Date**	**Description**	**Primary Location**	**Secondary Location**
Engineering	Latest Version	Engineering Drawings	Engineering File Room (accessible by Facility Shift Manager)	Project Records Services - CBFO Records Storage Facility
Emergency Management	Latest Version	Reports of Incidents requiring implementation of the Contingency Plan (RCRA operating record)	EOC	Project Records Services
Environmental Monitoring and Hydrology	Latest Version	Aerial Photograph of the Site	EOC	Environmental Monitoring and Hydrology
Environmental Monitoring and Hydrology	Latest Version	Environmental Monitoring Procedures Manual	EOC via Q&MIS; WIPP Site Library	Environmental Monitoring and Hydrology
Environmental Monitoring and Hydrology	Latest Version	Groundwater Protection Management Program Plan and Procedure Manual	EOC via Q&MIS; WIPP Site Library	Environmental Monitoring and Hydrology
Human Resources	Latest Version	Organizational Charts (latest version)	Human Resources (Corporate Privileged information)	M&O Contractor Corporate Offices
Business Management and Human Resources		Legal and financial records (accounting, social security, payroll, retirement, and insurance records)	Skeen/Whitlock Bldg.	Corporate Offices