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**APPENDIX 3**

**G-FSP-G-00026**

**REV. (5)**

**Functional Service Agreement between  
Savannah River Nuclear Solutions, LLC  
and  
Centerra Group, LLC  
for  
Environmental Stewardship & Safety and Health**

**May 1, 2015**

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## 1.0 INTRODUCTION

This Functional Service Agreement (FSA) describes specific Environmental Stewardship & Safety and Health Services (ES&SH) provided by Savannah River Nuclear Solutions (SRNS) and Centerra Group, LLC at the Savannah River Site (SRS) (Centerra-SRS). Safeguards, Security and Emergency Services (SS&ES) services are further described in G-FSP-G-000024.

## 2.0 POLICIES, PROCEDURES, AND MANUALS

1-01, *Management Policies, 7.6, Senior Environmental Managers Council*  
5Q, *Radiation Control Manual*  
5Q1.1, *Radiation and Contamination Control*

## 3.0 CODES AND STANDARDS

10 CFR 707, *Workplace Substance Abuse Programs at DOE Sites*  
10 CFR 712, *Human Reliability Program*  
10 CFR 835, *Occupational Radiation Protection*  
ANSI N43.2, *Radiation Safety for X-ray Diffraction & Fluorescence Analysis Equipment*  
ANSI N43.3, *General Radiation Safety Standard for Installations Using Non-Medical X-ray and Sealed Gamma Ray Sources, Energies*  
US Code 7661, *Title 5 of the Clean Air Act*  
49 CFR Part 40, *Procedures for Transportation Workplace Drug and Alcohol Testing*  
14 CFR Part 120, *Aeronautics and Space, Drug and Alcohol Testing Program*  
29 CFR 1910.1025, *OSHA, Toxic and Hazardous Substances, Lead*  
10 CFR 1046, *Physical Protection of Security Interests*

## 4.0 SERVICES

### 4.1 Industrial Hygiene Services

Centerra-SRS will provide its own Industrial Hygiene (IH) services whenever possible, including initial and baseline assessments. However, Centerra-SRS will rely on SRNS IH for support beyond Centerra-SRS's resources and/or expertise. When Centerra-SRS needs SRNS IH support, SRNS will provide IH technical support to Centerra-SRS by developing monitoring/sampling strategies and plans, conducting the monitoring/sampling, analyzing the data, and generating/disseminating documentation, as appropriate. When such cases arise, Centerra-SRS will provide SRNS with a scope of work and funding prior to the work. This support will be provided based on priorities for both companies.

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Centerra-SRS will provide its own IH monitoring equipment. However, when additional monitoring equipment is required, SRNS will provide this additional equipment if available. Centerra-SRS when utilizing SRNS IH instrumentation will comply with SRNS procedures governing its use. Centerra-SRS will remain responsible for documentation and any further use of the data acquired.

#### **4.2 Safety Engineering and ISMS Support**

Centerra-SRS will provide its own Safety Engineering and ISMS support. However, when the Centerra-SRS needs additional support, Centerra-SRS will provide SRNS a scope of work and funding prior to the work. This support will be based on priorities of both companies.

#### **4.3 SRNS Safety and Health (S&H) Database Support**

##### **4.3.1 Behavior Based Safety (BBS) Database**

SRNS maintains a BBS database at SRS that is utilized by the Centerra-SRS BBS Local Safety Improvement Teams to collect and analyze their observation data. Changes to the BBS database that are specific only to Centerra-SRS for their BBS needs, shall be paid for by Centerra-SRS. When such changes are necessary, Centerra-SRS will provide SRNS with a scope of work and funding prior to the work. This support will be provided based on priorities for both companies.

##### **4.3.2 Assisted Hazard Analysis (AHA) Database**

SRNS maintains the AHA database at SRS (including the manuals, procedures, web pages, and program files that describe the AHA database and process) that Centerra-SRS utilizes to define and document the scope of work and identify the hazards and controls associated with planned work. Changes to the AHA database that are specific only to Centerra-SRS for their AHA needs, shall be paid for by CENTERRA-SRS. When such changes are necessary, Centerra-SRS will provide SRNS with a scope of work and funding prior to the work. This support will be provided based on priorities for both companies.

#### **4.4 SRNS Safety and Health (S&H) Training and Qualification Programs**

Centerra-SRS will provide its own S&H training and qualification programs (radiation worker training is addressed in Section 4.6.1). Centerra-SRS may request to use SRNS S&H training, expertise, and training and qualification programs. When such cases arise, Centerra-SRS will provide SRNS with a scope of work and funding prior to the training.

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#### **4.5 Explosives Safety**

Centerra-SRS will review and approve Requests for Explosives Approval from SRNS and add approved explosives to the SRS Explosive Safety Site Plan (ESSP). The ESSP will be submitted to the DOE Authority Having Jurisdiction for explosives for approval. Centerra-SRS will support the SRS Explosives Safety Committee with one member and an alternate.

#### **4.6 Radiological Monitoring – Training and External and Internal Dosimetry Services**

##### **4.6.1 Training**

SRNS Site Training will provide radiation worker training to Centerra-SRS employees requiring such training for facility or area unescorted access in accordance with the SRNS Radiation Protection Program for compliance with 10CFR835. Training will be scheduled to accommodate the Centerra-SRS shift rotation. Radiation worker initial, remedial, and refresher training will be scheduled through the SRNS Training Records and Information Network (TRAIN) database or through Site Training. Centerra-SRS is responsible to ensure employees attend training required to comply with site requirements. The Centerra-SRS Training Coordinator will be provided a monthly listing of class locations and times by SRNS Site Training through email and/or the TRAIN database.

##### **4.6.2 Dosimetry**

Dosimeter issuance and reading for Centerra-SRS employees and visitors requiring such equipment for facility or area access or the performance of their duties on the general site will be provided by the SRNS Radiological Protection Department (RPD) in accordance with the SRNS program for compliance with 10CFR835. Dosimetry is provided by the RPD in each area on an as needed basis. Prior to being issued dosimetry, personnel must provide proof of qualification for entry to Radiological Buffer Areas (RBAs) and Radiological Areas. As part of the qualifications for unescorted entry into Radiological Areas, site employees must complete Radiological Worker Training which includes instructions on the use and care of dosimetry. In addition, all lost or damaged dosimetry will be investigated and a dose assigned by RPD prior to new dosimetry being issued. Centerra-SRS personnel will assist in the investigation as necessary.

##### **4.6.3 Bioassay**

Bioassay including in vivo methods (whole body radiation counts or other appropriate physical radiological counting practices) will be provided by RPD for Centerra-SRS employees and visitors requiring such counts for facility or area ingress or egress in accordance with the SRNS program for compliance with

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10CFR835. Impacted Centerra-SRS employees and visitors will report for in vivo bioassay as directed by RPD. Centerra-SRS employees and visitors will be contacted by the RPD when whole body counts are required. Centerra-SRS is responsible to ensure that employees and visitors obtain in vivo bioassay as required.

In vitro bioassay samples provided by Centerra-SRS employees and visitors for facility for area ingress and egress in accordance with the SRNS program for compliance with 10CFR835 will be analyzed by Analytical Laboratories with results interpreted by RPD. Impacted Centerra-SRS employees and visitors will provide in vitro bioassay samples as directed by RPD. Centerra-SRS is responsible to ensure that employees and visitors provide samples as required.

#### **4.6.4 Field, Facility, and Area Radiological Surveys**

Field, facility, and area radiological surveys will be performed by the SRNS RPD upon request from Centerra-SRS or as routinely required in accordance with the SRNS program for compliance with 10CFR835. Centerra-SRS will contact RPD to designate bioassay sample requirements prior to entering radiological areas as requested by the appropriate Radiological Work Permit (RWP).

#### **4.6.5 Individual Employee Radiological Exposure Records**

Individual employee radiological exposure records including yearly reporting to the employee, and 5Q, Part 781 requirements will be maintained by RPD. Records are protected in accordance with the SRNS program for compliance with 10CFR835. This is automatically performed by RPD, and there are no actions required by Centerra-SRS. Access to records requires the approval of the Centerra-SRS employee.

#### **4.6.6 Sources**

Instructions for accountability and control of sealed radioactive sources used by Centerra-SRS employees at SRS will be provided by RPD. Centerra-SRS will comply with SRNS Manual 5Q1.1, Procedure 502, for source control.

#### **4.6.7 Ionizing Radiation Generating Devices**

Ionizing Radiation Generating Devices instructions will be provided by RPD as required by SRNS guidelines and ANSI N43.2 and N43.3 industry standards. Centerra-SRS shall comply with SRNS Ionizing Radiation Generating Device Program per Manual 5Q1.1, Procedures 524 and 525.

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#### **4.6.8 Radiological Exposure Data**

Periodic statistical summaries of radiological exposure data will be provided by RPD to DOE-SR and others on site in accordance with the SRNS program for compliance with 10CFR835. Centerra-SRS access to reports is available upon request to RPD.

#### **4.6.9 Centerra-SRS Emergency Plans and Procedures**

Centerra-SRS Emergency Plans and Procedures for habitability concerns of Centerra-SRS personnel/posts during an operational or security emergency will be provided to and reviewed by RPD, as applicable.

### **4.7 Environmental Baseline Services**

It is the responsibility of Centerra-SRS to conduct operations in accordance with federal, state and local environmental regulations. The decision to use SRNS environmental support services other than those listed in 4.7.1 lies solely with Centerra-SRS. SRNS will perform any requested environmental service in compliance with applicable requirements. When obtaining services from SRNS, Centerra-SRS must meet the SRNS Manual 3Q Environmental Compliance Manual requirements as applicable to the service requested.

Centerra-SRS will coordinate regulatory compliance activities with SRNS to ensure these activities will integrate with site wide programs and provide SRNS with advanced notice and courtesy copies of regulatory correspondence pertinent to these activities.

DOE-SR requires the integration of the Centerra-SRS Environmental Management System (EMS) with the DOE and SRNS EMS requirements. A primary interface for facilitating the implementation and continuous improvement of the SRS EMS is the Senior Environmental Managers Council (SEMC). Centerra-SRS shall be adequately represented on the SEMC in order to provide current status of environmental activities and gain an understanding of other site regulatory activities that may impact Centerra-SRS and to share information with other tenant organizations as related to the EMS at SRS.

#### **4.7.1 Services and Functions**

SRNS will be responsible for the following ES&SH services and functions to Centerra-SRS.

- Maintaining the databases and computer programs needed to support the site's environmental programs. Access to all databases and necessary reports required for Centerra-SRS to effectively conduct its environmental program or contribute necessary information to SRNS will be provided.
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- Preparing and submitting the regulatory reports listed in 4.7.5. Centerra-SRS will provide the facility information to which it has access.
- Maintaining the required Resource Conservation and Recovery Act (RCRA) notification and reporting forms for the site and modifying the reporting form information assuming Centerra-SRS generates new waste in the future.
- Coordinating environmental audits by external organizations unless solely a Centerra-SRS issue and providing unannounced audit notifications to the appropriate Centerra-SRS contact as promptly as possible.
- Establishing the minimum training and qualification requirements for those acting in the capacity of Environmental Compliance Authorities (ECAs). Centerra-SRS shall train and qualify personnel as ECAs as needed to support obtaining services from SRNS. Centerra-SRS's environmental coordinator will need to attend on site environmental training classes which include, but are not limited to Environmental Laws, Environmental Compliance Authority (ECA) training, and annual Emergency Planning and Community Right-To-Know Act (EPCRA) training.
- Maintain environmentally related management policies and the 3Q Environmental Compliance Manual, including Site guidance and implementation documents (i.e. Best Management Practices, Stormwater Pollution Prevention, Spill Prevention Control and Countermeasure).
- Maintaining and teaching the following environmentally related courses:
  - Department NEPA Coordinator
  - Environmental Laws and Regulations
  - Environmental Compliance Authority
  - As the need arises, additional environmental classes may be added to this list.
- Providing the Site Environmental Protection Coordinator (SEPC) function. SRNS may request support of Centerra-SRS's environmental protection personnel whose area is affected during a spill event. All releases shall be reported to the SEPC, including radionuclide releases, as they can be subject to RCRA/CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) requirements.
- Coordinating and facilitating meetings and activities associated with the Senior Environmental Managers Council.

#### **4.7.2 Resource Conservation and Recovery Act (RCRA)**

SRNS will maintain the site's RCRA permit. The program for the treatment, storage, and/or disposal of radioactive, hazardous, mixed or non-hazardous wastes is managed by

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SRNS. Centerra-SRS will follow the sitewide program and contact SRNS personnel as necessary for assistance.

#### **4.7.3 The National Environmental Policy Act (NEPA) Program**

The National Environmental Policy Act (NEPA) program will be managed by SRNS. Centerra-SRS will be granted access to the NEPA database. Centerra-SRS will implement a program that integrates with the SRNS program.

#### **4.7.4 Asbestos Abatement / Demolition License**

SRNS will maintain the site's asbestos group license. All requests for demolition/abatement permits will be processed by SRNS. Each project is responsible for the payment of fees associated with individual license.

#### **4.7.5 Report Preparation**

SRNS will be responsible for preparing and submitting the following reports:

- Hazardous Waste EPCRA Tier II
- EPCRA Form R
- Asbestos
- South Carolina Department of Health and Environmental Control (SCDHEC) Point Source Data Report
- Title V Air Compliance Reports
- If other reports are added in the future, SRNS will prepare them, and Centerra-SRS will review for approval in the same manner as appropriate.

Centerra-SRS shall provide information to SRNS as needed to complete and submit the above listed in reports.

#### **4.7.6 Site-wide Environmental Permits**

SRNS will prepare, submit and obtain site-wide environmental permits, with Centerra-SRS concurrence, as appropriate. Centerra-SRS shall be responsible for providing information as requested to support preparation of site-wide permits.

#### **4.7.7 Environmental Fees**

Centerra-SRS will be responsible for its share of any environmental fees associated with obtaining permits for activities that are not covered by site-wide environmental permits.

#### **4.7.8 Notices of Violation**

Centerra-SRS will provide information to SRNS as needed to support responding to Alleged Notices of Violation that may pertain to or are associated with Centerra-SRS activities.

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#### **4.7.9 National Pollutant Discharge Elimination Systems**

SRNS and Centerra-SRS are responsible for complying with applicable National Pollutant Discharge Elimination System (NPDES) General Permits and the SRS site specific permit # SC0000175. Each party is responsible for complying with conditions governing outfalls under the respective control of each Party, regardless of which Party is designated as the operator or owner's representative in the NPDES permit. Any liabilities (e.g., penalties, fines) or costs (remedial in nature or enhancements to infrastructure) incurred will be borne by the Party exceeding or otherwise failing to comply with permit conditions or responsible for the outfalls and discharges from said outfalls. Centerra-SRS will comply with the applicable procedures in the SRNS Manual 3Q, *Environmental Compliance* that govern NPDES program compliance.

#### **4.8 Medical Services**

SRNS Medical Services will provide medical services to Centerra-SRS during normal and emergency operations as follows:

##### **4.8.1 Physical Evaluations**

- Provide physical evaluations for pre-placement, termination, medical surveillances and for other reasons as requested by Centerra-SRS.
- Provide medical evaluations, including but not limited to:
  - Providing audiometric testing facilities and trained personnel to perform audiograms.
  - Notifying Centerra-SRS Industrial Hygienist of employees having hearing loss (temporary or permanent threshold shift) possibly related to workplace noise.
  - Conducting a pulmonary function test for all Centerra-SRS employees requiring a respirator fit test.
  - Alerting the Centerra-SRS Industrial Hygienist to suspected occupational illnesses to facilitate early evaluations and correction of problems.

##### **4.8.2 Occupational Injury/Illness**

Provide medical service for occupational illnesses, injuries, and off-site referrals when warranted. Documentation which includes the extent of injury and restriction will be provided to the Centerra-SRS Supervisor for appropriate action. The Centerra-SRS Industrial Hygienist will be included, if appropriate, in the investigation of occupational illnesses.

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#### **4.8.3 Fitness for Duty**

Provide Fitness for Duty evaluations as required by 10 CFR 1046, *Physical Protection of Security Interest*.

[Note: The SRNS Physical Protection Medical Director (PPMD) is in the process of obtaining board eligibility in occupational medicine as required by 10 CFR 1046, and as outlined in SRNS-J0000-2014-0001, *SRNS Response to DOE Request for Information Concerning Implementation of the Revised 10CFR1046*, and subsequent revisions, which was initially transmitted to DOE-SR on 1/16/14.]

#### **4.8.4 Emergency Medical Services and Ambulance Transport**

Provide emergency medical services and ambulance transport. Centerra-SRS representative should dial 3-3911 (onsite) or (803) 725-3911 (offsite or cellular) for emergency services.

#### **4.8.5 X-Ray and Electrocardiogram (ECG)**

Provide x-ray and ECG services for Centerra-SRS employees as necessary. Centerra-SRS employees should contact the Centerra-SRS Physical Fitness Section for scheduling.

#### **4.8.6 Substance Abuse Testing**

- Provide routine and random substance abuse testing of Centerra-SRS employees in accordance with 10 CFR Part 707. Centerra-SRS will contact SRNS Medical Operations and Services to schedule testing and to obtain results.
- Administer drug and alcohol testing for Centerra-SRS pilots in compliance with 49CFR Part 40 and 14CFR Part 120 and for Centerra-SRS employees with a Commercial Driver's License (CDL). Upon return of test results, a Medical Review Officer will review and report test results to Centerra-SRS. Test results on pilots and CDL Drivers will be ready for pick-up by the Centerra-SRS Designated Employee Representative within two days of receipt of results by SRNS.

#### **4.8.7 Medical Records**

- Maintain records for all medical services provided to Centerra-SRS employees, including the results of all medical examinations and testing. Records are protected in accordance with the requirements of the Privacy Act and other applicable statutes, regulations, and DOE Orders. Medical information regarding medical restrictions may be disclosed to the Centerra-SRS Case Management Officer, OSHA Recordkeeper, Industrial Hygienist and Senior Physical Fitness Instructor. All Centerra-SRS Employee Blood Lead Analysis Reports will be disclosed to the Centerra-SRS Senior Physical Fitness Instructor for additional medical attention. Information relating to occupational injury or illness will be disclosed to the Centerra-SRS Industrial Hygienist for occupational injury or illness clarification. A copy of the report will be
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kept in the employee's permanent medical record. Further access to employee's medical records must have a written approval from the Centerra-SRS employee.

#### **4.8.8 Vaccinations and Vaccines**

- Provide yearly influenza vaccinations (when available). Centerra-SRS employees desiring such service will appear at the SRNS staffed medical facility (719-5N) during seasonal vaccination periods as announced by SRNS.
- Maintain the Centerra-SRS purchased supply of Hepatitis B Vaccine (HBV), administer HBV to Centerra-SRS personnel, counsel and provide follow-up medical services to affected Centerra-SRS employees, and recommend appropriate action on any employee showing signs or symptoms of HBV or HIV (AIDS) infection; and maintain permanent confidential medical records of exposure and include inoculations and any counseling or follow up procedures conducted. Centerra-SRS employees will contact SRNS Medical Operations and Services to schedule inoculations. Medical records retention is automatic. Access to records requires the approval of the Centerra-SRS employee.

#### **4.8.9 Prescription Safety Glasses**

Provide prescription safety eyeglasses in accordance with the SRNS Prescription Safety Eyeglass Program. Centerra-SRS will provide a valid activity code and management approval for eye wear obtained through the program. The Centerra-SRS Senior Safety Technician will contact the optician to schedule appointments.

#### **4.8.10 Human Reliability Program (HRP)**

Provide psychological evaluations for: a) inclusion in the Human Reliability Program; and, b) other psychological Fitness for Duty issues upon request.

Evaluations shall include clinical interviews and may -- as necessary and at the discretion of the psychologists -- include administration of appropriate psychological tests. Available psychological tests include, but are not limited to the following:

- Minnesota Multiphasic Personality Inventory 2 (MMPI-2 or MMPI-2RF)
  - Personality Assessment Inventory
  - Wechsler Adult Intelligence Scales
  - Wechsler Memory Scales
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#### **4.8.11 Sharps**

Provide sharps containers for use by Centerra-SRS when specifically requested by the Centerra-SRS. SRNS will be responsible for disposal of sharps containers for Centerra-SRS; however, SRNS Medical Operations and Services will not become the collector of all sharps found on the SRS.

#### **4.8.12 Blood Lead Level Monitoring**

Monitor blood lead levels every six months for those employees designated by the Centerra-SRS Industrial Hygienist as potentially high risk. The Centerra-SRS Senior Physical Fitness Instructor will notify SRNS Medical Operations and Services of all personnel requiring blood lead monitoring and will schedule the testing. All Centerra-SRS Employee Blood Lead Analysis Reports will be disclosed to the Centerra-SRS Industrial Hygienist for additional medical attention. The test results will include the following information: Name of employee, blood lead level, allowable limit under 29 CFR 1910.1025. Blood lead level sampling and analysis shall have an accuracy (to a confidence level of 95 percent) within plus or minus 15 percent or 6 ug/dl; whichever is greater. Test results will be forwarded within 20 working days of test date.

#### **4.8.13 Biomedical Waste Disposal**

Provide for disposal of biomedical waste generated by the Centerra-SRS. Operate under SRNS's generator and transporter identification numbers regarding disposition of all biomedical waste generated by Centerra-SRS on SRS. Centerra-SRS will place all contaminated items in red bags(s) containing the bio hazard symbol. The bag shall be marked in indelible ink with the date, location of origin and initials of the person sealing the bag. The sealed bag will be transported to SRNS Medical Operations and Services, Building 719-5N, Room 511. Centerra-SRS will place all needles/sharps into the red sharps containers marked with the biohazard symbol, date the container in indelible ink, seal it and transport it to SRNS Medical, Building 719-5N, Room 511. Centerra-SRS will seal, date, and transport the waste. Waste will be transported the same day it is sealed and dated. No SRNS action required regarding the identification numbers.

#### **4.8.14 Decontamination of Helicopter**

SRNS SS&ES will clean and decontaminate the Centerra-SRS helicopter with an EPA approved virucidal and mycobacteriocidal hospital disinfectant after its use as an air ambulance. Centerra-SRS should contact SRNS SS&ES to schedule the cleaning and decontamination.

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## **4.9 Contractor Assurance**

The following describes Contractor Assurance services that SRNS will provide to Centerra-SRS:

### **4.9.1 Contractor Assurance Processes**

Contractor Assurance Processes scope is defined for this FSA as the Site Tracking, Analysis and Reporting (STAR) functions.

- Maintain manuals, procedures, InSite web pages, program files, and archived documents for the following programs:
  - STAR database to include Corrective Action Tracking, Self-Assessment Module.

**5.0 SERVICE INFORMATION SUMMARY**

<b>SRNS Services</b>	<b>Estimated Units</b>
Safety and Health (S&H) Database Support	Programmatic
Dosimetry	1600 Annual Instances
Field, Facility and Area Radiological Surveys	Incidental
Employee Radiological Exposure Records / Data	Programmatic
Sealed radioactive source / Ionizing Radiation Generating Device Control	Incidental
RPD review of Centerra-SRS Emergency Plans and Procedures	Incidental
Environmental Baseline Services (e.g. NEPA/RCRA, Asbestos Abatement, Demolition Licensing, Emt. Fees, NPDES)	Programmatic
Physical Evaluations / HRP	500 Annual Instances
Medical Service for Illnesses / HRP (to include X-Ray/ECG, Substance Abuse Testing, Vaccinations & Vaccines, Prescription Safety Glasses, Sharps/Biomedical Waste Disposal, Blood Lead Level Monitoring)	Incidental
Ambulance Transport	Incidental
Emergency Medical Services	Incidental
Medical Records	Programmatic
Helicopter Decontamination	Incidental

**6.0 INTERFACE CONTROL INFORMATION**

This section does not apply to this appendix.

## 7.0 POINTS OF CONTACT

Both parties shall assign single Points of Contact (POCs) who will be responsible for coordinating and administering all matters related to this agreement. All requests for services shall flow through these POCs (or their functional designees). The POCs for this agreement are:

**SRNS:** Dean Van Pelt, ES&SH Program Support

Thomas Cowlam, Quality Programs (Contractor Assurance)

**Centerra-SRS:** Thomas L. Martin, Manager, Occupational Safety and Health

## 8.0 APPROVALS

Alice C. Doswell, 5-6-15  
Alice Doswell Date  
Senior Vice-President, ES&SH  
Savannah River Nuclear Solutions, LLC

Raymond H. Smith, 5/28/15  
Raymond H. Smith Date  
Acting Assistant General Manager  
Centerra-SRS

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