
APPENDIX 6

REV. 6

G-FSP-G-00006

**Functional Service Agreement Between
Savannah River Nuclear Solutions, LLC
and
Savannah River Remediation, LCC**

For

Environmental Stewardship & Safety, and Health Services

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1.0 INTRODUCTION

This Functional Service Agreement (FSA), Appendix 6 of Memorandum of Agreement (G-MOA-G-00002) describes the service exchange between the Savannah River Site (SRS) Management and Operating (M&O) Contractor, Savannah River Nuclear Solutions, LLC (SRNS) and Savannah River Remediation, LLC (SRR).

This appendix describes the Environmental Stewardship &, Safety and Health Services (ES&SH) baseline work to be provided. Included may be, programmatic responsibilities for the Site, as well as certain tasks related to monitoring program effectiveness and activities considered to be part of Site Landlord Services. Task-related activities that are requested will be documented in this FSA as defined in Contracting Officer (CO) direction to SRNS. Activities not included in the FSA will be requested by the tenant utilizing the Service Level Agreement (SLA) process. The parties agree to review this FSA periodically (not to exceed a period of two years) and revise it if changes are needed as determined by both parties.

Unless otherwise noted in this document, the services described do not apply to SWPF/Parsons.

2.0 POLICIES, PROCEDURES AND MANUALS

The following policies, procedures, and manuals will be maintained for the Site by SRNS and apply when services are provided. This is not intended to be an all-inclusive list of policies, procedures, and manuals:

Manual Number	Manual Title	Applicable Section(s)
4Q	Industrial Hygiene Manual	All
8Q	Employee Site Safety Manual	All
4Q1.1	Industrial Hygiene Survey	All
4Q1.2	Industrial Hygiene Instrument	All
Q3.1	Medical Manual	All
21Q	Protection of Human Subjects in Research	All

Q1-1	ESHQ Administrative Procedures	All
3Q	Environmental Compliance Manual	All
5Q	Radiological Control	All
5Q1.1-1.12; 5Q2.1-2.7; Q3	HP Instrument Calibration Facility Procedures;	All
SCD-6	SRS ALARA Manual	All
Q18	DOE-SR Radiological Assistance Program Response;	All

3.0 CODES AND STANDARDS

Requirements from these codes and standards are integrated into SRNS policies and procedures as applicable.

Code or Standard	Title
10CFR 850 and DOE-STD-1187-2007	Chronic Beryllium Disease Prevention Program Rule and Registry
10CFR 851 and reference standards per sections 851.22 and 851.23	Worker Safety and Health Rule
EEOICPA of 2000	Energy Employee Occupational Illness Compensation Program Act
DOE O 443.1B	Protection of Human Subjects
DOE O 458.1	Radiation Protection to the Public and the Environment

DE-AC09-08SR22470	SRNS Contract (Section C-3.4)
DEAR Clauses: 48CFR 970.5204-2 and 970.5223-1	SRNS Contract (Section I.38 and Section J, Appendix E)
DOE-STD-1190-2007	Injury & Illness Surveillance Program
DOE M 440.1-1A	DOE Explosives Safety Manual
ANSI Z358.1	Safety Shower and Eyewash Standard
DOE N456.1	Safe Handling of Unbound Nanoparticles
DOE 231.1B	Environment Safety and Health Reporting
10CFR835	Occupational Radiation Protection
10 CFR 707	Workplace Substance Abuse Programs at DOE Sites
10 CFR 710	Personnel Security Assurance Program
10 CFR 712	Human Reliability Program
10 CFR 1008	Records Maintained on Individuals (Privacy Act)
10 CFR 1046	Physical Protection of Security Interests, Subpart B Protective Force Personnel, Appendix A Medical and Physical Fitness Qualification Standards
21 CFR 13	Drug Abuse Prevention and Control (Controlled Substances Act of 1970)
21 CFR 1301	Registration of Manufacturers, Distributors, and Dispensers of Controlled Substances
21 CFR 1305.4	Persons Entitled to Order Schedule I and Schedule II Controlled Substances
21 CFR 1306	Prescriptions
29 CFR 1910	OSHA Requirements for General Industry

29 CFR 1910.95	Occupational Noise Exposure
29 CFR 1910.120	Hazardous Waste Operations and Emergency Response
29 CFR 1910.133	Personal Protective Equipment
29 CFR 1910.134	Respiratory Protection
29 CFR 1910.1020	Access to Employee Exposure and Medical Records
29 CFR 1910.1030	Bloodborne Pathogens
29 CFR 1926	OSHA Requirements for Construction
41 CFR 60 741.23	Medical Examinations and Inquiries
42 CFR 353-49	Clinical Laboratory Improvement Act Amendments

42 CFR 493.1773	Standard: Basic Inspection Requirements for All Laboratories Issued a CLIA Certificate and CLIA-Exempt Laboratories
45 CFR 160 Public Law 104-191	Health Insurance Portability and Accountability Act of 1996 (HIPAA)
49 CFR 40	Procedures for Transportation Workplace Drug and Alcohol Testing Programs
49 CFR 41	Where Does a Urine Collection for a DOT Drug Test Take Place?
49 CFR 382	Controlled Substances and Alcohol Use and Testing
49 CFR 391, E	Physical Qualifications and Examinations
CAOHC	Hearing Conservation Manual, Third Edition
CDC MMWR 51 1-48, 10/25/02	CDC Guideline for Hand Hygiene in Health-Care Settings: Recommendations of the Healthcare Infection Control Practices Advisory Committee and the HICPAC/SHEA/APIC/IDSA Hand Hygiene Task Force

Dept. of Health and Human Services	“Mandatory Guidelines for Federal Workplace Drug Testing Programs” Federal Register 06/09/1994
Dept. of Transportation	“Procedures for Transportation Workplace Drug and Alcohol Testing” Federal Register 08/16/2010
5 U. S. C. 552(a)	Privacy Act
42 U. S. C. 12101	Americans with Disabilities Act
DOE Order 341.1A	Occupational Medical Programs
DOE Order 350.1 Chapter 8	Contractor Human Resource Management Programs, Contractor Workplace Substance Abuse Programs
DOE Order 580.1(4)(h)	Controlled Substance, Hypodermic Needles, Syringes and Potable Alcohol
43 FR 4377	Radiation Protection Guidance to Federal Agencies for Diagnostic X-Rays
43 FR 11970	Mandatory Guidelines for Federal Drug Testing Programs

NFPA 471 10.1.2-3	Recommended Practice for Responding to Hazardous Materials Incidents – Medical Monitoring
NFPA 1500	Standard of Fire Department Safety and Health Program
NFPA 1581	Standard on Fire Department Infection Control Program
NFPA 1582	Comprehensive Occupational Medical Program for Fire Departments
NFPA 1583	Standard on Health-Related Fitness Programs for Fire Department Members
NFPA 1584 Annex A 6.6.2	Standard on the Rehabilitation Process for Members During Emergency Operations and Training Exercises
SC Code 40-38	South Carolina Law Governing the Practice of Opticianry

SC Code 42-15-10	South Carolina Worker Compensation Claims
SC Code 44-93	South Carolina Infectious Waste Management Act
SC Regulation R.61-105	South Carolina Infectious Waste Management Regulations
SC Regulation R.61-20	South Carolina Communicable Disease Reporting
SC Regulation R.61-64	South Carolina Rules and Regulations for X-ray Equipment
<i>(unnumbered document)</i>	DOE Implementation Guide for Medical Standards for DOE Firefighters (5/21/96)
<i>(unnumbered document)</i>	Approach to Nanomaterial ES&H, Revision 3a – May 2008 (issued by DOE Nanoscale Science Research Center, Office of Science)

4.0 SERVICES

4.1 Safety and Health

SRNS will be responsible for establishing and maintaining a Safety and Health (S&H) program for SRNS and SRR. The program includes oversight and administration of the procedures, the process, requirements, and training for the Industrial Hygiene (IH) and Industrial Safety Programs. SRNS will provide information to SRR regarding changes in S&H regulatory requirements. SRNS provides the following services and functions to SRR:

4.1.1 Assisted Hazard Analysis Program

SRNS will be responsible for maintaining the Assisted Hazard Analysis (AHA) Program, with SRR change concurrence. SRR will be represented on the AHA Committee.

4.1.2 Injury and Illness Reporting

See Section 7 of the MOA (G-MOA-G-00002)

4.1.3 Industrial Hygiene (IH) Services

SRR is responsible for performing their own IH activities, including IH recordkeeping, except for the following:

SRNS will be responsible for providing American Industrial Hygiene Association (AIHA) accredited IH Laboratory Services to SRR, as requested. SRR may use IH Laboratory Services as needed. SRNS will report sampling results to the SRR IH that submitted the samples.

SRNS S&H will be responsible for maintaining an IH subject matter expert (SME). SRNS Environmental Bioassay Lab (EBL) will report sampling results to the SRR IH that submitted the samples. SRNS will not report results for SRR employees to DOE or other organizations without first notifying the POC in SRR or the SRR ESH Director.

SRNS will be responsible for maintaining sufficient IH instrument inventory and calibration services for SRR and transfer of electronic calibration records to the Electronic Document Workflow System (EDWS). SRR may use these services as needed. The need for specialty instrumentation by SRR will be handled as an incremental service.

4.1.4 Databases and Computer Program Support

SRNS will maintain the various databases and computer programs supporting Safety and Health (S&H), including Lotus Notes IH Forms, Medgate/EMBOS, Exposure Assessment Database, AHA, Medical Surveillance Program, Respirator Information Tracking System (RITS), Focused Observation Database, Behavior-Based Safety (BBS) Database, Legacy Safety Reporting Databases, Confined Space and S&H Web pages. SRR will be requested to concur on major modifications of software or databases and will be given access to those systems needed to implement the S&H programs. SRNS will provide safety and injury statistics services for SRR.

4.1.5 Construction Safety S&H Field and Program Support

Both SRNS and SRR will be responsible for providing Construction Safety S&H field and program support for the respective facility/project S&H field staff as needed.

4.1.6 Maintenance of Procedure Manuals

SRNS will be responsible for maintaining the *Employee Safety Manual* (8Q Manual), *Industrial Hygiene Manual* (4Q), and the *Automated External Defibrillator Program* (6Q-012). SRR concurrence will be requested on modifications to these programs or manuals.

4.1.7 Interpretations of and Deviations from S&H Program Requirements

The SRNS S&H Director will be responsible for the process for requesting and approving interpretations of and deviations from S&H Program requirements. SRNS or SRR S&H Managers are responsible for approving interpretations/deviations as appropriate for their operations.

4.1.8 S&H Training and Qualification Programs

The SRNS S&H Director will be responsible for SRNS S&H Training and Qualification programs, with SRR concurrence. SRR will be responsible for implementing those programs at its facilities. If SRR facility needs are unique and the training and qualification requirements are not covered by the site-wide program, SRR will develop facility-specific training and qualification programs.

SRNS will be responsible for establishing the minimum training and qualification requirements for all site S&H staff, with SRR concurrence. SRNS and SRR are both responsible for maintaining qualifications for S&H program Subject Matter Experts (SMEs) as defined in 10CFR851.

4.1.9 Data Maintenance

SRNS will maintain archived safety reporting data generated prior to July 1, 2009, and SRR will be given access to archived data, as necessary. SRNS and SRR corporate entities will be responsible for maintaining independent Occupational Health and Safety Act (OSHA) 300 Logs after August 1, 2008, and after July 1, 2009, for their operations. SRNS will provide injury data to SRR.

4.1.10 Disability Case Management

SRNS will provide Disability Case Management services for SRNS employees. SRR will provide Disability Case Management services for SRR employees.

4.1.11 Compliance with 10CFR851

SRR will be responsible for generating and maintaining its own 10CFR851 Worker Safety and Health Program consistent with the site-wide program. SRR will self-perform the following functions for their facilities and operations:

- Functional Area (FA)-20 Assessments
 - Annual Health and Safety Plan
 - S&H support for SRR Facility Evaluation Board (FEB) activities
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- Compliance Assessment and Implementation Reports (CAIRs), OSHA 300 Log and 300-A Summary Administration and Safety Reporting
- Worker Safety and Health Program
- Notification of IH Laboratory sampling results to the various projects after receiving results from SRNS
- Event notification and reporting

SRNS and SRR S&H Management are responsible for submitting to Department of Energy (DOE) any 10CFR851 Subpart D variances in their operations.

4.2 Baseline Services: Radcon

4.2.1 Compliance with 10CFR835

SRNS shall be responsible for generating and maintaining the 10CFR835-compliant Radiation Protection Program (RPP) document, with SRR concurrence, for SRS, including activities conducted by SRR. SRNS shall be the RPP POC for DOE. The SRR POC shall support SRNS in maintaining the RPP, including responding to requests for revisions, and reviewing and approving, as appropriate, RPP updates.

SRNS and SRR retain individual responsibility for compliance to the SRS RPP, 10CFR835, and all other related regulatory requirements. (Tri-annual audit requirements of the RPP implementation as part of SRR operations will utilize the IEB in conjunction with SRR Radiation Protection Staff.)

SRNS shall provide access and support to SRR for necessary reviews of services provided by SRNS. SRR shall provide funding for any additional equipment or analyses required to support such program reviews.

4.2.2 Maintenance of 5Q, Radiological Control Manual

SRNS will be responsible for maintaining 5Q, *Radiological Control Manual*, with SRR concurrence. Some specific responsibilities identified in the 5Q Manual are designated as follows:

- Article 113 approval is the responsibility of the SRNS Radiation Protection Department (RPD) Director or designee (113.3.b).
 - Approval of Qualification/Requalification training programs is the responsibility of the SRNS RPD Director or designee (126). SRR shall provide concurrence to changes to the Qualification/Requalification training programs.
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- The SRR RPD Director or designee (511.6) will be responsible for approving SRR personnel to wear Thermo Luminescent Dosimeters (TLDs) offsite.
- Concurrence in the Radiological Control (RC) Training Program is the responsibility of the SRNS and SRR Radiation Protection Managers (613.9).
- The direction to perform bioassay sampling (522.5.c) shall be at the direction of each company's Radiation Protection Manager/Director.
- The approvals required to allow personnel to exceed the site Administrative Control Limit (ACL) (211.3 and 312.7) are company specific. SRNS shall approve exceedance for its personnel, and SRR shall approve exceedance for its personnel.
- The SRR Radiation Protection Manager shall be responsible for approving the resumption of work following a "Stop Work" (345.3) within SRR.

SRNS shall retain responsibility for maintaining other site-level manuals such as 5Q1.1-1.12; 5Q2.1-2.7; Q3 Manual, *HP Instrument Calibration Facility Procedures*; Q18 Manual, *DOE-SR Radiological Assistance Program Response*; SCD-6, *SRS ALARA Manual*; Q1-1; and 1Q, *Quality Assurance Manual*, with SRR concurrence.

4.2.3 Exchanging Work Services

Radiological Protection Inspectors (RPIs) may be requested by either party through the appropriate POC to work in the other company. A Service Level Agreement (SLA) will be established to accommodate charges for such work.

4.2.4 Training and Qualification Requirements

SRNS, with SRR concurrence for the Liquid Waste Operations (LWO) scope, will be responsible for establishing the minimum training and qualification requirements for RPIs, Multi-skilled Technicians (MSTs), Advanced Rad Workers, and RPD First Line Managers.

SRNS shall retain a database for required reading for all RPIs and RPD Managers in both SRNS and SRR. SRNS will distribute SRR requests for required reading and will maintain records of completion.

SRNS will support development of training material or classes.

4.2.5 Management of Non-Compliances

The affected company shall be responsible for determination, reporting and management, including completion of corrective actions, of regulatory non-compliances.

4.2.6 Radiological Assistance Program

SRNS shall coordinate and manage the Radiological Assistance Program (RAP). Both SRNS and SRR will staff the program, according to their contract requirements. The company radiation protection manager shall negotiate any necessary additions or subtractions to the current staffing with the SRNS RAP Contractor Response Coordinator.

The labor and travel costs associated with RAP activities shall be reimbursed by the RAP program. An SLA will be established to accommodate charges for such work.

RAP personnel shall respond according to their RAP Team assignment, regardless of the source of the event.

4.2.7 Subcontracted RPIs

SRNS shall provide the Subcontract Technical Specialist services as described in 5Q1.1, Procedure 532, for subcontracted RPIs procured by SRR.

4.2.8 Radiation Monitoring Equipment Program

Manual 1B, *Management Requirements and Procedures*, Procedure 4.22, “Control of Radiation Monitoring Equipment,” establishes the Radiation Monitoring Equipment Advisory Committee (RMAC).

The Site Radiation Monitoring Equipment (RME) Technical Authority shall review and approve SRR procurements of RME that will be calibrated and/or maintained by SRNS. SRNS will be responsible for filling the Site RME Technical Authority role. SRNS will be responsible for the management of the SRS RME program as outlined in Manual 1B, Procedure 4.22. SRNS shall develop and maintain the following SRS Technical Basis Manuals with SRR consultation:

- RME Technical Basis Manual
- SRS Workplace Air Monitoring Technical Basis Manual
- SRS RME Technical Specifications Manual

4.2.9 SRNS Central Counting Facility

The SRNS Central Counting Facility will be responsible for counting air samples and providing analysis as requested by SRR, including the following:

- Transporting samples to the counting facility. SRR shall ensure that samples are placed at the pickup station as scheduled
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- Disposing of samples
- Providing technical support for area radiation monitors
- Calibrating portable radiological survey instruments and transporting instruments to and from the Calibration Facility. SRR shall ensure that instruments are placed at the pickup station as scheduled
- Interfacing with vendors as necessary to support SRR instrumentation issues, including acting as STR and Access Control Point (ACP) for selected vendor subcontracts

4.2.10 Commodity Management Center RME Database

SRNS shall develop and maintain the Commodity Management Center RME (CMCRME) database. SRR shall utilize the database and maintain accurate information regarding instruments within the database. As part of maintaining the database, SRNS shall provide SRR with the following:

- Inventory management information for all portable RME and some semi-portable RME (e.g., status location, customer)
 - Reliability-centered trend analysis
 - Electronic calibration data sheets
 - Routine and custom reports, including instrument inventory, instrument recall notices, maintenance backlog, calibration data sheets, etc.
 - Out-of-Calibration notices within 10 working days of instrument receipt. The notices shall be sent directly to the facility Point of Contact (POC)
 - Electronic dosimeter information transferred directly to ProRad (vendor product)
 - Portable RME calibration information, which is transferred to the Visual Survey Data System (VSDS)
 - Transfer of electronic calibration records to the Electronic Document Workflow System (EDWS)
 - Electronic Quality Control Source Check forms (RME instrument operability checks)
 - Technical support and guidance during loss of the CMCRME database
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4.2.11 Radioactive Source Control Management

SRNS shall be responsible for filling the role of the SRS Radioactive Source Control Coordinator. This role entails the following duties:

- Review and approve all SRR procurements of sealed radioactive sources
- Calibrate SRR Measuring and Testing Equipment (M&TE) radioactive sources
- Maintain a database of all accountable sealed radioactive sources under control of site contractors

SRR shall notify the Source Control Coordinator of the movement on and off site of all sources.

4.2.12 SRS Site Radiation Generating Device Coordinator

SRNS shall be responsible for filling the role of the SRS Site Radiation Generating Device (RGD) Coordinator. The RGD Coordinator shall review and approve all SRR RGD procurements.

SRR shall be responsible for conducting regulatory-driven RGD assessments of its facilities and operations. SRNS shall provide the criteria for such assessments, if requested.

4.2.13 Respiratory Protection Program Administrator

SRNS will serve as the Respiratory Protection Program Administrator and will serve as the POC with the Respiratory Equipment Facility.

4.2.14 Services for Savannah River National Laboratory (SRNL)/Department of Homeland Security (DHS)

Support from SRR for Savannah River National Laboratory (SRNL)/Department of Homeland Security (DHS) projects and special studies shall be arranged through task specific SLAs.

4.2.15 In Situ Object Counting System

SRNS shall provide access and support to SRR for use of an In Situ Object Counting System for waste and source term characterization. Support shall include the following:

- Maintaining system per manufacturer's requirements (e.g., annual calibration, computer and software upgrades, support frame, shields and collimators, LN₂ filling of cryostat, etc.)
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- Providing training to SRR staffing on operation and modeling software
- Providing SME support required in the development and performance of training

4.2.16 Maintenance/Repair of Radiological Instruments

SRNS will provide personnel to perform hands on repair and calibration of radiological instruments in the Health Physics Instrument Calibration Facility.

4.2.17 Management of Engineering Standard 01064

SRNS shall maintain Engineering Standard 01064, which provides radiological design requirements, and will only be revised with concurrence from SRR. SRNS maintains configuration management of computer codes used for radiation transport and shielding calculations. For codes not maintained by SRNS, SRR can provide configuration management with SRNS concurrence. SRR radiological engineers will have access to the codes for their use.

4.2.18 Dosimetry Records

SRNS ES&SH will be responsible for maintaining SRR personnel dosimetry records as follows:

- Retaining and providing protection and maintenance of existing personnel dosimetry records for SRR. SRR dosimetry records include records for SRR employees, SRR subcontractors, site DOE personnel associated with SRR, individuals monitored for occupational dose while visiting SRR from other sites and organizations, and Members of the Public (MOPs) visiting SRR.
 - Creating and maintaining personnel dosimetry records for new SRR employees and the other classifications of personnel. To support this effort, SRR shall provide timely (nightly) employee data feeds, including social security numbers and organization codes, to SRNS employee databases.
 - Providing personnel dosimetry records services for SRR such as ready access to or timely copies of dosimetry file contents or dose information for employees or SRR management as appropriate and consistent with the Privacy Act. Services shall also include reasonable research and responses for Freedom of Information Act (FOIA) requests, data requests associated with legal actions, epidemiological studies and other scientific data-gathering activities approved by DOE.
 - Providing normal processing and final disposition of personnel dosimetry records as SRR employees and subcontractors terminate employment; SRR shall provide employee termination data to SRNS employee databases on a regular basis (monthly).
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- Processing individual SRR employee requests for dosimetry records. The SRR POC shall be engaged to resolve disputes or assist in resolving problems encountered in communicating with the requesting employee. SRNS shall ensure the SRR POC is aware of any external agency or organization requests for records related to SRR employees prior to making them available.

4.2.19 Radiation Exposure Reporting and Documentation Services

SRNS ESSH shall provide SRR with the following radiation exposure reporting services:

- Quarterly dose summary reports for monitored subcontractor employees. (Monthly and quarterly cycle summary and highlights reports for SRR monitored employees shall be provided by RPD Dosimetry Services.
- Required individual annual radiation exposure summary reports to all SRR-monitored employees and subcontractors. These reports shall be issued directly to exempt and terminated employees. The reports for SRR hourly workers shall be distributed through their supervisors. For SRR subcontractors, these reports shall be mailed to their respective company contacts. SRR shall provide employee supervisor and site mailing address information to SRNS employee databases.
- Required monthly dose reports to the Radiation Exposure Monitoring System (REMS) for 'Special Individuals' associated with SRR. ('Special Individuals' are defined by DOE Manual 231.1-1A.)
- Required annual REMS dose reports for SRR monitored personnel. SRNS will not report results for SRR employees to DOE or other organizations without first notifying the POC in SRR or the SRR ESH Director.
- Copies of routine monthly and quarterly dose reports and special dose assessments or analyses requested by SRR management.

SRNS ESS&H shall also provide the following electronic records services:

- Energy Employee Occupational Illness Compensation Program Act (EEOICPA) - Support EEOICPA requests by providing dose and dosimetry records research and data retrieval for SRR and WSRC employees.
 - Visual Survey Data System (VSDS) - Support and maintain the VSDS software for electronic documentation of radiological surveys. This support entails necessary software maintenance and upgrades and provisions for upkeep of and access to the database. Information Technology (IT) support shall ensure compatibility of SRR and
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SRNS computer network functionality and security. SRNS shall provide VSDS training for new employees of SRR.

- Electronic Document and Workflow System (EDWS) - Manage transmittal to and long-term recordkeeping of approved surveys in the EDWS in Records Administration.

4.2.20 ProRad System

SRNS shall support and maintain the ProRad software used to control access to radiological areas, generate Radiation Work Permits (RWPs), track dosimetry requirements, etc. SRR shall continue to utilize the ProRad system while SRNS provides the radiation dose tracking/records and training/qualification status confirmation and reports. If SRR develops a software equivalent to ProRad for their use, the replacement software must be able to provide the appropriate dose-tracking information in a format that can be accepted by ProRad if there is an expectation of continuation of radiological record maintenance.

SRNS will be responsible for the following services:

- Defining and maintaining minimum hardware and infrastructure requirements for utilization of ProRad desktop and RWP – LogIn station operation. SRR shall provide for the hardware and infrastructure required for operation (i.e., computer, power, network)
 - Facilitating in-facility support for RWP – LogIn station installation (ProRad – Worker Access), including computer security configuration measures, ProRad software, and radiological hardware specific to RPD programs support
 - Providing online/desktop installation for the desktop version of ProRad, (ProRad – GroupApps)
 - Providing network and security access of appropriate SRR personnel to the ProRad server and software
 - Providing routine administrative support for ProRad. Information Technology (IT) will support site software utilities used in conjunction with ProRad. This includes the annual and incidental maintenance agreements with the software vendor
 - Providing support to Site RP Training for training new SRR RPIs and managers in the use of ProRad in normal training classes
 - Maintaining a ProRad web site providing, at a minimum, a ProRad User’s Guide, ProRad User Account information, and a SME list for RP programs supported by ProRad. If SRNS and SRR establish separate fire walls, this information shall be provided to SRR for inclusion inside the SRR firewall
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- Providing site communications regarding software updates, functionality, and outages that impact ProRad operations

SRR will be responsible for the following:

- Providing SME support for ProRad changes
- Providing IT support to ensure system compatibility
- Maintaining and supplying an organizational structure in an electronic format consistent with SRNS computing infrastructure requirements at a level of detail consistent with the SRR dose reporting and personnel accountability requirements
- Supplying employee information to SRNS for inclusion as follows: Name, Date of Birth, Social Security Number, Gender, and Address. The data shall be provided in an electronic format consistent with SRNS computing infrastructure requirements to satisfy SRNS dose reporting requirements
- Maintaining a Site User Identification (ID) consistent with site computing infrastructure requirements
- Providing written notification of ProRad-specific software problems leading to out-of-service RWP – LogIn stations and/or the ProRad desktop application

4.2.21 Dosimetry Services

SRNS shall provide Department of Energy Laboratory Accreditation Program-(DOELAP)-accredited internal and external dosimetry services. SRNS shall utilize a POC in SRR for reporting routine and special results. SRNS will not report results for SRR employees to DOE or other organizations without specific approval of the POC in SRR or the SRR ESH Director. The following specific radiobioassay and internal dosimetry services are provided by SRNS for monitoring SRR personnel:

- Internal dose assessment and assignment
 - DOELAP- accredited whole body counting
 - DOELAP-accredited chest counting
 - Wound counting
 - DOELAP-accredited tritium urine bioassay
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- DOELAP-accredited actinide urine bioassay
- DOELAP-accredited fission/activation product urine bioassay
- Personal air sampling counting and data handling
- Notification of SRR personnel of routine radiobioassay requirements
- Administration of radiobioassay program
- 24-hr on-call response to events involving personnel with potential for intake of radioactive material, including technically based recommendations for event-based bioassay sampling. SRR will be responsible for requesting event-based sampling and ensuring that the SRNS RPD Director is informed of such decisions
- Employee counseling with regard to potential or real exposures when requested by the SRR POC. SRNS dosimetrists shall inform the SRR POC of any employee direct requests for information or counseling that involves exposures or events
- Complete dosimetry services (TLD return, closeout radiobioassay, paperwork, etc.) for SRR terminating employees

Note: At the request of SRR, SRNS shall accelerate critical bioassay analysis as feasible

DOELAP Accredited External Dosimetry TLDs (whole body and extremity) shall be provided, transported, and delivered by SRNS to SRR RPD personnel for issuance to SRR personnel through ProRad. SRR shall return the TLDs through ProRad. The TLDs shall be returned through ProRad and then returned to SRNS External Dosimetry for processing and reporting of assigned dose. Anomalous TLD results shall be communicated to SRR RPD personnel who shall then initiate an investigation (as necessary) to determine the appropriate dose and document the results through ProRad.

SRNS shall support the visitor briefing provided to personnel participating in site tours and may brief such visitors as requested by SRR. SRR shall provide timely notice of the need to support visitor briefs and shall be responsible for establishing the need for RWP sign in and additional facility-specific information. SRR will be responsible to ensure the RWP sign in is conducted and that facility-specific information is presented. SRNS and SRR shall arrange for TLD issuance and return on a case-by-case basis.

4.2.22 Dose Assessment Review Board (DARB)

SRS Manual 5Q2.6, Procedure 503, "Internal Dose Assessment and Reports," describes the Dose Assessment Review Board (DARB) and its role in dose assignment. The SRNS Health Physics Services (HPS) Manager shall coordinate convening of the Board for an

SRR employee, and serve as Co-Chair, along with an SRR-assigned Co-Chair. The inclusion of an SRR Co-Chair will ensure proper communication channels are discussed and decided upon prior to releasing the final dose to the worker.

4.3 Baseline Services: Environmental

4.3.1 Services and Functions

SRNS will be responsible for the following services and functions to SRR.

- Implementing (establish and maintain) a site-wide environmental monitoring program, including preparation of the Annual Environmental Report required by DOE Order.
 - Transporting samples to the laboratory.
 - Maintaining databases and computer programs needed to support the site's environmental programs. Access to all databases and necessary reports required for SRR to effectively conduct its environmental program or contribute necessary information to SRNS will be provided.
 - Providing short term consulting, as requested by SRR, on SRR-specific permits for responses to any regulatory requests or Notices of Violation addressed to SRR. In cases where SME support is needed for an extended period of time an SLA will be negotiated by the parties.
 - Notifying SRR of any exceedance relevant to SRR operations as soon as possible after results are received from the laboratory. SRNS will not report any SRR exceedances relevant to SRR operations to DOE or other organizations without first notifying the POC in SRR or the SRR ESH Director.
 - Maintaining environmentally related management policies and the 3Q *Environmental Compliance Manual*, including guidance documents.
 - Maintaining Resource Conservation Recovery Act (RCRA) notification and reporting forms South Carolina Department of Health & Environmental Control (SCDHEC) 2701 for the site and modify the form if SRR generates new waste in the future.
 - Providing short term regulatory support to facilitate compliance with the SRS Federal Facility Agreement (FFA) and Site Treatment Plan (STP), as well as providing electronic access to currently approved versions of the FFA and STP. In cases where SME support is needed for an extended period of time an SLA will be negotiated by the parties.
 - Maintaining the SRS FFA Administrative Record.
-

- Coordinating regulatory permitting and installation approvals of subsurface drilling, including monitoring well installation and abandonments, underground injection activities, and providing SRR with regulatory correspondence pertinent to these activities.
- Coordinating environmental audits by external organizations unless solely an SRR issue, and providing unannounced audit notifications to the appropriate SRR contact as promptly as possible.
- Maintaining 1-01, *Management Policies*, MP 4.1, “Environmental Assurance,” with concurrence from SRR.
- Establishing the minimum training and qualification requirements for those acting in the capacity of Environmental Compliance Authorities (ECAs), with SRR concurrence.

Maintaining and teaching the following environmentally related courses as deemed necessary by Site Training:

- Department National Environmental Policy Act (NEPA) Coordinator
- Environmental Laws and Regulations
- Superfund (Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA]): Your Guide to Clean-up
- Staffing the Site Environmental Protection Coordinator (SEPC) function. SRNS may request support of SRR’s ECA whose area is affected during an event. All releases shall be reported, including radionuclide releases, as they can be subject to regulatory requirements.
- Maintaining the Wastewater Operator-in-Charge (OIC) licensee certification and renewal programs. SRR will provide SRNS with the fees required by the South Carolina Licensing Board for renewal of SRR’s certified operators’ licenses.
- Providing the Subcontract Technical Representative (STR) function for the offsite laboratory contracts necessary to fulfill site environmental monitoring program needs.
- Managing the NEPA program. SRR will be granted access to the NEPA database.
- Maintaining 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 associate with individual licenses.

SRR will be responsible for the following functions:

- SRR will contribute/review/concur as necessary for the site-wide environmental program to be appropriately implemented.
- SRR shall ensure that properly completed Chain of Custody (COC) records and samples are available as scheduled.
- Providing adequate representation on the Senior Environmental Managers Council in order to provide the current status of environmental activities, and to gain an understanding of other site regulatory activities that may impact SRR.
- Participating in the Site Environmental ALARA Program.
- Notifying SRNS of any SRR operational issue that could have an environmental impact as soon as possible.
- Preparing and transmitting of annual reports required to be submitted to the SCDHEC and Environmental Protection Agency (EPA) Region 4 pursuant to the terms and conditions of the SRS FFA (e.g. FFA Appendix IX reports, Tank Closure Interim Action documents), the Industrial Wastewater Treatment Facility Permit for the F/H Area Tank Farms, Consent Order of Dismissal (regarding the Saltstone Facilities) and the Statement of Resolution of Dispute Agreement regarding Tanks 18 and 19.
- Preparing and submitting documentation that liquid radioactive waste storage tanks in the F- and H-Area Tank Farm are being closed according to general closure plan requirements.
- Paying all environmental fees associated with obtaining environment permits and license to support work activities associated with SRR facilities and operations.
- Providing to SRNS such data as may be required by SRNS to comply with and maintain any SRS environmental permits issued to either DOE or SRNS and which regulate or pertain to SRR operations. All information and data shall have written approval by SRR management before submittal to SRNS.

4.3.2 Groundwater Monitoring Program

The site's groundwater monitoring program, as currently outlined in groundwater plans and reports will be managed by SRNS, including well installation and abandonment, the routine collection and analysis of groundwater samples as well as modeling and reporting. SRNS will be responsible for developing groundwater reports and the preparation of groundwater monitoring plans. These documents will be provided to SRR for submittal to the regulatory agencies. In cases where facility-specific support is needed for an extended period of time, an SLA will be negotiated.

4.3.3 Site Wide Report Preparation

SRNS will be responsible for preparing and submitting the following reports after contribution review and concurrence by SRR as appropriate.

- RCRA Hazardous Waste Permit Reporting
- Polychlorinated Biphenyl (PCB) Annual Document Log and PCB Annual Report
- Site Treatment Plan (STP)
- Annual FFA reports (e.g. Annual Progress Report, Removal Action Report) except for FFA Section IX reports
- Emergency Planning & Community Right to Know Act (EPCRA) Tier II
- EPCRA Form R
- Asbestos Program Reporting
- SRS Annual Environmental Report
- South Carolina Department of Health and Environmental Control (SCDHEC) Point Source Data Report
- Title V Air Permit - Air Compliance Reports
- Annual Radiological National Emission Standards for Hazardous Air Pollutants (NESHAP) Report
- National Pollutant Discharge Elimination System (NPDES) Permit Reporting

4.3.4 Site-Wide Environmental Permits

SRNS will prepare, submit and obtain site-wide environmental permits, with SRR concurrence, as appropriate.

SRR Facility Specific Permits

SRR shall be responsible for Liquid Waste Operations (LWO) only permits and lead negotiations with regulators. A list of SRR facility permits includes the following:

- Industrial Wastewater Treatment Facility permits for LWO facilities
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- Saltstone Disposal Facility Industrial Solid Waste Landfill permit
- Underground Storage Tanks (Diesel Fuel)
- Domestic water lines and systems within LWO
- Sanitary lines and systems within LWO

SRR will prepare applications for permits that apply to their operations and facilities. SRNS support for these activities is available using the SLA process.

4.3.5 Notices of Violation

The responsibility to respond to Alleged Notices of Violation (NOVs) is governed by the provisions of DOE contracts with SRNS and SRR.

4.3.6 Well Sampling Interfaces

SRNS has ownership of groundwater monitoring wells within SRR LWO facilities that are used for CERCLA and other regulatory required groundwater monitoring. SRNS has the responsibility to sample and maintain these wells in accordance with applicable regulations and regulatory agreements. SRR has the responsibility to ensure that the wells are protected and secured from ongoing activities with their facilities. All SRNS activities will be coordinated with the appropriate SRR facility and access will be in accordance with SRR direction.

4.4 Baseline Services: Occupational Medicine Services

SRNS will provide services to all SRR employees and, as appropriate, to SRR subcontractor employees and SRR visitors. Services provided will be those necessary to evaluate, treat, and stabilize the injury or illness and/or provide transfer to an outside medical facility. Services include the provision of medical personnel to support site/facility emergencies and emergency drill exercises.

SRNS will provide the following health evaluations when they are determined necessary by the Site Occupational Medical Director for the purpose of providing initial and continuing assessment of employee fitness for duty:

- **New Hire Evaluation:** This is performed at the time of employment entrance. A new hire evaluation is a medical pre-placement screening evaluation of the individual's general health and physical capacity to perform work to establish a baseline record of physical condition and ensure fitness for duty.
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- Medical Surveillance Evaluations: For those enrolled in specific medical surveillance programs. SRNS will perform the following surveillance evaluations including, but not limited to:
 - Enhanced Fitness for Duty (EFFD)
 - Asbestos
 - Hearing Conservation
 - Department of Transportation (DOT)
 - Human Reliability Program (HRP)
 - Lasers
 - Beryllium
 - Hazardous Waste Operations and Emergency Response
 - Lead
 - Special Vision
 - Respiratory Protection
 - Nanotechnology

Medical personnel will schedule employees for visits to the medical service facility for required health evaluations.

An SLA will be negotiated by the Parties to address changes in service delivery by the performing organization as needed.

4.4.1 Patient Information

In accordance with regulatory requirements, Medical personnel will provide patients with information on reasons for evaluation and results, including recommendations for temporary/permanent work restrictions.

4.4.2 Other Provided Medical Services

- X-rays and electrocardiograms (EKGs) per medical surveillance programs and in support of occupational injury or illness assessments
 - Medical clinic laboratory services in support of medical surveillance programs either through on-site performance of urinalysis/blood chemistry analysis or through
-

establishment of subcontracts with off-site facilities holding any necessary credentials/certification.

- **Periodic Health Assessments:** Periodic monitoring as recommended by the Site Occupational Medical Director, or when requested by line management for job accommodations
- **Provide Employee Job Task Analysis (EJTA) process to SRR and offer Fitness for Duty determination assistance to SRR employees per a mutually agreed upon schedule.**
- **Diagnostic Evaluations:** Diagnostic Evaluations, in consultation with SRR, to evaluate employee's injuries and illnesses to determine work relatedness of injury and ability to return to work along with any medical restrictions upon return to work
- **Post-Injury Management:** Provide post-injury management and occupational injury consultation
- **Return-to-Work Evaluation:** After all occupational disabilities and after nonoccupational disabilities lasting longer than 40 scheduled working hours, a return to work evaluation will be performed to support determination of the individual's physical capacity to perform work and return to duty
- **Exit Evaluation:** At the time of separation from employment, individuals will be offered a general health evaluation to establish a record of physical condition

4.4.3 Management of Medical Records

SRNS will be responsible for the management of employee medical information (paper, electronic, etc.) associated with occupational medical program. Management of health information activities includes the performance of the following types of activities:

- Maintaining and providing on-site storage of all medical records in accordance with regulatory requirements
 - Maintaining confidentiality of employee health records
 - Generating surveillance exam notices
 - Interfacing with Electronic Data Warehouse System (EDWS) for permanent record retention
 - Providing copies of medical record information as requested in accordance with authorized processes and procedures
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- Interfacing with Human Reliability Program (HRP) and maintaining required documentation and database systems

4.4.4 Drug and Alcohol Testing Program

SRNS will establish and provide a Drug and Alcohol Testing program meeting requirements contained in 10 CFR 707, 712, and 49 CFR 40 to SRR employees, subcontractor employees, and visitors (as appropriate). SRNS will manage all aspects of the site drug and alcohol testing program (DAT), which includes the following activities:

- Performing and/or managing services and information related to the performance of all types of substance abuse testing including, but not limited to, initial, random, or for cause. This also includes the management of any necessary systems to randomly select employees from required site populations at required frequencies.
- Notifying employees of their selection for testing
- Managing samples and test results
- Performing reviews of testing results (by a qualified Medical Review Officer [MRO] as needed)
- Interfacing with management and security personnel as appropriate concerning the results of substance abuse testing activities

In the event of a SRR employee testing positive, SRR will be notified and SRR's disciplinary process for positive test results will be followed in addition to the site's requirements relating to access and employment.

4.4.5 Hazardous Infectious Waste Disposal

Biomedical Waste Disposal

SRNS will provide for disposal of biomedical waste generated by the SRR. SRR will operate under SRNS's generator and transporter identification numbers regarding disposition of all biomedical waste generated by SRR on SRS. SRR will place all contaminated items in the red bag(s) marked with the biohazard symbol, date them in indelible ink, seal them and transport them to SRNS Medical Operations and Services, Building 719-5N.

Sharps

SRNS will provide sharps containers for use by SRR when specifically requested. SRNS will be responsible for disposal of sharps containers for SRR; however, SRNS Medical Services will not become the collector of all sharps found on the SRS. SRR will contact

SRNS Medical Services to schedule drop-off of sharps containers. SRR 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. SRR will seal, date, and transport the waste. It is the responsibility of SRR to comply with all applicable orders and regulations governing infectious waste (e.g., R.61-105, South Carolina Infectious Waste Management Regulations) until transfer to SRNS.

4.4.6 Prescription Safety Eyeglass Program

SRNS will maintain and provide management of the Prescription Safety Eyeglass program which will be available to SRR employees, and as appropriate, to SRR subcontractor employees.

4.4.7 Self-Assessment of Medical Services

In support of the provision of these medical services, SRNS will perform reviews and assessments of ambulance runs and provide feedback and recommended improvement opportunities; review the scope of emergency medical services provided and provide training and oversight of emergency medical personnel and activities, including site drills and exercises.

4.4.8 Employee Counseling and Health Promotional / Health and Productivity Programs

SRNS will provide, review, and approve the medical and behavioral aspects of employee counseling and health promotional programs, including the following:

- Contractor-sponsored or contractor-supported Employee Assistance Programs (EAPs)
- Contractor-sponsored or contractor-supported alcohol and other substance abuse rehabilitation programs
- Contractor-sponsored or contractor-supported health and productivity programs
- The medical aspects of immunization programs, blood-borne pathogens programs, and bio-hazardous waste programs to evaluate their conformance to applicable guidelines
- Medical emergency response procedures included in site emergency and disaster preparedness plans

SRNS will also provide limited scope and other preventive medical-related activities to employees as available, including the following:

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- Immunizations - flu, Hepatitis A & B, TB testing, etc., as deemed reasonable or necessary by the Site Occupational Medical Director
 - Employee consultations for foreign travel medical requirements
 - Personal injury/illness consultation as related to Fitness for Duty
 - Medical personnel to participate in field visits/evaluations of facilities to help identify and mitigate potential major causes of premature morbidity in the workplace as scheduled by SRR
 - Medical personnel to participate in employee safety and health meetings
 - “Health and Productivity” activities may be supplemented with access to other subcontracted wellness activities such as wellness screenings, health fairs, and web-based information associated with individual wellness topics
 - Technical assistance with the medical module of the site’s Medical Software System (MSS)
 - Medical personnel as available and requested to assist in SRS Operations Center (SRSOC) during site emergencies and drills
 - Facilities necessary to house and order supplies for the occupational medical program related services

Requested services will be performed in accordance with the terms and conditions of the contract with DOE.

Any SRR employed medical personnel shall operate under the license of the SRNS Site Occupational Medical Director (SOMD) and are required to comply with all applicable South Carolina laws and regulations on certification and licensing. Such SRR Medical personnel shall take medical direction and guidance from the SOMD.

An MOA will be developed between SRNS and SRR to document protocols for delegation of medical acts by the SRNS physician to SRR medical personnel. These protocols will contain the information required by South Carolina law.

4.5 Scope for Procedures & Administrative Support

SRNS shall provide the following procedures and administrative support services (consistent with current services) to SRR:

- Routing Program Documents to SRR for review and concurrence
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- Working with procedure reviewers and procedure SMEs to resolve comments and restraints
- Facilitating AHA process as applicable for Program Documents
- Administering the periodic review process for Program Documents
- Assembling and processing site-level procedure history files
- Administering the Required Reading Program for Program & Program Documents, as required.
- Providing scheduling support for General Employee Training (GET)
- Providing the Division Records Officer (DRO) and records processing support for all Program Documents
- Providing document control and distribution for all Program Documents
- Providing web posting for all Program Documents
- Providing STR support for all RPD Staff Augmentation Contracts

4.6 Service Availability

SRNS SMEs for ProRad, VSDS the CMCRME database and the other databases supporting SRR operations shall notify SRR of planned outages or major changes and/or modifications with sufficient lead time to enable SRR to undertake an impact analysis and development of contingencies. SRR will be required to concur on new or replacement software or databases.

The SRNS and SRR POCs shall negotiate personnel availability as needed. Mechanisms to provide status and track progress as defined in the SLA should be utilized to track long term (greater than two weeks) commitments with updates provided as necessary.

Procedure support will be provided on a straight day-shift hour schedule.

4.7 Additional Requirements

SRNS will permit SRR to perform assessments or reviews of SRNS work activities to support the SRR requirements of such source documents as Engineering Standards, DOE Orders, standards/requirements identification document (S/RID) contract requirements,

etc. These assessments/reviews will be coordinated with appropriate SRNS personnel performing the pertinent activities.

5.0 INTERFACE CONTROL INFORMATION

SRNS will maintain a controlled list of all SRS outfall custodians. The current list of custodians is provided on the SRNS Environmental Compliance website. Custodianship responsibilities are defined in 3Q, *Environmental Compliance Manual*.

6.0 SERVICE UNIT INFORMATION

For SRR, see Section 6 and Attachment 1 of MOA (G-MOA-G-00002).

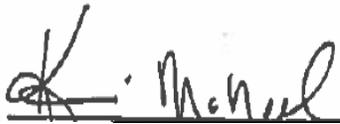
7.0 POINTS OF CONTACT

Both parties shall assign single 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 following persons serve as POCs for this agreement:

SRNS: Kimberly Baker, ES&SH Program Manager

SRR: S. Kevin Smith, Manager, ESH Programs

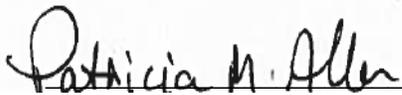
8.0 APPROVALS



Kliss McNeel
Senior Vice President, ES&SH
Savannah River Nuclear Solutions, LLC

13/23/2018

Date



Patricia M. Allen
Director, ESH&QA & CA
Savannah River Remediation

13/26/18

Date
