

U. S. DEPARTMENT OF ENERGY
 WORK BREAKDOWN STRUCTURE DICTIONARY
 PART II - ELEMENT DEFINITION

1. PROJECT TITLE/PARTICIPANT Environmental Management/Bechtel Jacobs Company LLC		2. DATE 10/01/02	3. IDENTIFICATION NUMBER DE-AC05-98OR22700
4. WBS ELEMENT CODE 04.02.03.01		5. WBS ELEMENT TITLE BJC Support of DOE Investigation and Litigation	
6. INDEX LINE NO. N/A	7. REVISION NO. AND AUTHORIZATION Rev 3		8. DATE 02/24/03
9. APPROVED CHANGES N/A			
10. SYSTEM DESIGN DESCRIPTION N/A		11. BUDGET AND REPORTING NUMBER N/A	
12. ELEMENT TASK DESCRIPTION			
<p>WBS GRAPHIC</p> <p>See attached.</p> <p>INTRODUCTION</p> <p>BJC support of DOE Investigation and Litigation includes the activities for litigation expenses as well as other Paducah support activities directed by DOE. Lawsuits included in this LCB submittal are listed below.</p> <p><u>Linda Oreskovich, et al, v. Spencer Abraham, Lockheed Martin Energy Systems, et al</u> Class Action case filed on 3/15/01 Alleges that plaintiffs, a punitive class of former employees who suffered occupational exposure to transuranics, are entitled to damages.</p> <p><u>Alphonse Rainer, Garland Jenkins, et al, v. Lockheed Martin Energy Systems, et al</u> <u>Gordon Hancock, et al, v. Lockheed Martin Energy Systems, et al</u> Class Action cases which, in January 2001, were ordered consolidated for processing and scheduling purposes. Hancock, filed on 3/14/00, alleges that the plaintiffs were injured by exposure to transuranics and other radioactive material. Rainer, filed on 9/3/99, alleges that the plaintiffs have suffered damages from exposure to hazardous substances.</p> <p><u>Warren Smith and Jack Wray, et al, v. Lockheed Martin Energy Systems, et al</u> Class Action case filed on 1/3/97 Alleges that plaintiffs, a punitive class of those who reside and/or own property near the Paducah Gaseous Diffusion Plant have suffered unspecified personal and property damages. The plaintiffs allege that emissions (both airborne and groundwater) from the plant have damaged their property. In addition, the plaintiffs allege that emissions from the plant have increased their risks of succumbing to cancer and caused them to have to have a very high fear of cancer.</p> <p><u>David Ray Gray, et ux, v. Lockheed Martin Energy Systems, et al</u> Tort Action filed on December 11, 2000 Alleges that Mr. Gray was exposed to transuranics, chemicals, and radiation from performing maintenance work on earth moving equipment belonging to a Paducah subcontractor.</p> <p><u>James E. Dew, et al, v. Spencer Abraham, Lockheed Martin Energy Systems, et al</u> Five separate class action cases are consolidated under Dew (Dew, English, Langston, Rainer II, and Shaffer). These were ordered consolidated, for processing and scheduling purposes, in January 2001. Dew – filed 8/28/00 alleges that plaintiffs, who represent a punitive class of employees, suffered occupational exposure to transuranics. English – filed 12/7/00 alleges that plaintiffs, who represent a punitive class of area residents, have suffered</p>			

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<p>from “bodily injuries” and other forms of physical and psychological pain from exposure to transuranics. Langston - filed 9/20/00 alleges that plaintiffs, who represent a punitive class of employees, suffered occupational exposure to transuranics and other dangerous chemicals. Rainer II - filed 8/7/00 alleges that plaintiffs, who represent a punitive class of former employees, suffered occupational exposure to transuranics. Shaffer - filed 12/7/00 alleges that plaintiffs, who represent a punitive class of former and deceased plant workers, subcontractors, and nearby land owners, have been victimized by cancer and other medical concerns from being exposed to transuranics.</p> <p>Defense costs will be handled through Government Transfers from LMES.</p>		
<p>LOGIC RELATIONSHIPS</p> <p>None</p>		
<p>SCOPE DESCRIPTION</p> <p>Release Sites and Facilities:</p> <p style="padding-left: 40px;">Assessments to be completed – N/A</p> <p style="padding-left: 40px;">Actions to be completed – N/A</p> <p>Past and Future Accomplishments:</p> <p style="padding-left: 40px;">Past Accomplishments:</p> <ul style="list-style-type: none"> ? Reimbursed LMES for defense costs for the following ongoing lawsuits: Smith, Rainer, House & Miller and Hancock. ? Completed the Phase II of the North South Diversion Ditch Trenching. ? Supported the Beryllium Studies. ? Reworked the complex-wide Summary Report for RU Mass Balance. ? Provided support to DOE/DOJ, as directed. ? Completed the Final Report for the Excavation of the North/South Diversion Ditch Project. ? Completed FOIA Request OR-99-300. Prepared documents for public release. ? House & Miller Lawsuit has been closed <p style="padding-left: 40px;">Future Accomplishments:</p> <ul style="list-style-type: none"> ? Reimburse LMES for defense costs for the following ongoing lawsuits: Smith, Rainer, Dew, Gray, and Oreskovich. ? Continue to provide support to the DOE, as directed. ? Complete Sitewide Beryllium Study as directed by DOE. <p>Scope: (FY 2003 through Completion)</p> <p>Reimburse LMES for defense costs for the following ongoing lawsuits; Smith, Rainer, Dew, Gray, and Oreskovich, including but not limited to the following: litigation fees, advancements and disbursements billed by VSS&P, expert consultants/witnesses, and support services. Support services include but are not limited to the following: charges for all outside (no-expert witnesses) support services, including document copying, imaging, coding (OCR), trial exhibits jury consulting, etc. Provide BJC and subcontractor personnel support as directed by DOE.</p>		

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These FOIA requests involve documents that were held by the Justice Department as a part of their investigation. These requests were received in CY 2000 and are closely associated with FOIA Request OR-99-300 (Completed in FY02). It will be prudent to review these documents and prepare for public release immediately following the response to FOIA Request OR-99-300.

It is the core value of Bechtel Jacobs Company that the safety and health of every worker and the public at large, and our environment, are the most important assets we are entrusted to protect. To accomplish this, an Integrated Safety Management System (ISMS), based on DOE's ISMS has been implemented that incorporates the five core functions and is based on the seven guiding principles. The objective of ISMS is to systematically integrate safety and environmental protection into the planning and execution of all work activities. The term safety encompasses Nuclear Safety, Industrial Safety, Industrial Hygiene, Occupational Health, Health Physics, and environmental issues. ISMS requirements flow-down to Bechtel Jacobs Company subcontractors. The Five Core Functions are: (1) Define the scope of work, (2) Analyze hazards, (3) Develop and implement hazard controls, (4) Perform work within controls, and (5) Provide feedback and continuous improvement. The Seven Guiding Principles are (1) Line Management Responsibility for Safety, (2) Clear Roles and Responsibilities, (3) Competence commensurate with responsibility, (4) Balanced Priorities, (5) Identification of Safety Standards and Requirements, (6) Hazard Control Tailored to Work Being Performed, and (7) Operations Authorization.

Before a subproject begins, several activities must be completed that demonstrate that all involved in the project have completed rigorous health and safety reviews and that all potential hazards of doing the work have been identified. The routine activities in RA are conducted in accordance with standard operating procedures, activity hazard analyses, and Integrated Safety Management plans. Non-routine work will require a readiness assessment as necessary to ensure complete health, safety, and environmental reviews prior to work start. This assessment is conducted by people, experienced in similar kinds of work, with the right to examine all aspects of a project about to commence, and require that the project team provide documented evidence that any applicable requirements of the job have been met.

A BJC subcontractor, PRSM, will perform beryllium sampling at the PGDP to assist in the completion of a baseline beryllium characterization as prescribed by 10 CFR 850, Chronic Beryllium Disease Prevention Program. Field sampling is designed to provide a UCL_{95,95} and will follow the proposed strategy as described in the attached document. A report will be prepared following the receipt of the analytical results from the laboratory.

REQUIREMENTS/DRIVERS

Bechtel Jacobs Company LLC Contract DE-AC05-98OR22700, December 18, 1997
Integrated Safety Management System Description, BJC/OR-87, Revision 2, September 1999
"Integrated Safety Management System Description, BJC-GM-1400, Revision 2, October 2001 and
Integrated Safety Management System Supplement, BJC-GM-1401, Revision 0, December 2000"

As applicable, indicate other regulatory-related requirements.

CERCLA: N RCRA: N DNFSB: N DOE Orders: N AEA: N UMTRCA: N State: N Other: N

WASTE VOLUMES

Please see attached waste performance metrics, as applicable.

PROJECT SCHEDULE

Please see attached project summary schedule, and Milestone Status Summary Report.

EXECUTION YEAR BASELINE

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Please see attached Budgeted Cost of Work Scheduled Plan.		
BASELINE BY YEAR Please see attached Baseline by Year Report.		