

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

<b>1. PROJECT TITLE/PARTICIPANT</b> PCB Activities/Bechtel Jacobs Company LLC		<b>2. DATE</b> 10/01/02	<b>3. IDENTIFICATION NUMBER</b> DE-AC05-98OR22700
<b>4. WBS ELEMENT CODE</b> 04.02.04.03		<b>5. WBS ELEMENT TITLE</b> PCB Activities	
<b>6. INDEX LINE NO.</b> N/A	<b>7. REVISION NO. AND AUTHORIZATION</b> Rev. 1		<b>8. DATE</b> 01/23/03
<b>9. APPROVED CHANGES</b> N/A			
<b>10. SYSTEM DESIGN DESCRIPTION</b> N/A		<b>11. BUDGET AND REPORTING NUMBER</b> N/A	
<b>12. ELEMENT TASK DESCRIPTION</b>			
<p><b>WBS GRAPHIC</b></p> <p>See attached.</p> <p><b>INTRODUCTION</b></p> <p>To perform activities at the Paducah Gaseous Diffusion Plant (PGDP) to maintain compliance with the Toxic Substance Control Act (TSCA) and Uranium Enrichment (UE) TSCA Federal Facilities Compliance Agreement (FFCA), as well as applicable DOE orders.</p> <p><b>LOGIC RELATIONSHIPS</b></p> <p>Implementation of the TSCA FFCA will continue until the initiation of long-term stewardship. Upon start-up of Paducah Gaseous Diffusion Plant D&amp;D project, the D&amp;D project will assume responsibility and funding for compliance with the FFCA. Disposal costs for the disposal of newly generated waste will be the responsibility of Environmental Management WBS 04.03.12.01 Newly Generated Waste.</p> <p><b>SCOPE DESCRIPTION</b></p> <p style="padding-left: 40px;">Release Sites and Facilities        Assessments to be completed        N/A</p> <p style="padding-left: 40px;">Actions to be completed        N/A</p> <p><b>Past and Future Accomplishments</b></p> <p style="padding-left: 40px;">Past Accomplishments</p> <ul style="list-style-type: none"> <li>? Developed and submitted quarterly and annual update reports on status of the sampling, cleanup and reporting of PCB spills as required under the TSCA FFCA.</li> <li>? Sampled and analyzed PCB spills and equipment and performed ambient air monitoring.</li> <li>? Conducted routine inspections of collection trough system, open spill sites, and equipment.</li> <li>? Performed repair, preventive maintenance, and installation of new troughs and drop legs in the collection system as required..</li> <li>? Completed decontamination and closeout of all PCB gasket spills.</li> <li>? Performed maintenance of PCB trough manifolds.</li> </ul>			

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<p>Future Accomplishments</p> <ul style="list-style-type: none"> <li>? Develop and submit quarterly and annual update reports on status of the sampling, cleanup and reporting of PCB spills as required under the TSCA FFCA</li> <li>? Sample and analyze PCB spills and equipment and perform ambient air monitoring</li> <li>? Conduct routine inspections of collection trough system, open spill sites, and equipment</li> <li>? Perform repair, preventive maintenance, and installation of new troughs and drop legs in the collection system as required.</li> <li>? Complete decontamination and closeout of all PCB gasket spills.</li> <li>? Perform maintenance of PCB trough manifolds</li> </ul> <p><b>Scope</b></p> <ul style="list-style-type: none"> <li>? Manage the task under direction of a task manager, with support from project and cost control, procurement, scheduling, and estimating personnel.</li> <li>? Collect data for and submit one annual summary and four quarterly reports.</li> <li>? Interface with customer and regulators and interpret regulations.</li> <li>? Track data from spill reports and inspections.</li> <li>? Sample and analyze air quality on a quarterly basis.</li> <li>? Sample and analyze spill sites, equipment, and other PCB materials.</li> <li>? Certify sample data and validate spill site cleanup.</li> <li>? Inspect trough containment and collection system and drop legs, open and active spill sites, and perform routine, periodic inspections of transformers and other equipment. These collection systems, spill sites, and equipment are located within areas covering over 6.4 million ft<sup>2</sup> of floor space.</li> <li>? Maintain the collection and containment trough system, consisting of over 16, 000 troughs.</li> <li>? Containerize any liquid waste that collects in the system drop legs.</li> <li>? Containerize solid wastes from cleanup activities.</li> <li>? Place collected wastes in compliant storage awaiting disposal.</li> <li>? Newly generated waste will be containerized and characterized to meet Treatment, Storage and Disposal Facilities (TSDFs) Waste Acceptance Criteria (WACs).</li> <li>? Clean spill sites from gasket or equipment leaks.</li> <li>? Decontaminate materials affected by the spill.</li> <li>? Maintain boundaries for control of personnel access.</li> <li>? Decontaminate all PCB spill sites.</li> <li>? Characterize all TSCA FFCA generated PCB waste.</li> </ul> <p><b>Safety and Health Work Performance</b></p> <p><b>Introduction to the section</b></p> <p>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)</p>		

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<p>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.</p> <p>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 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.</p> <p><b>REQUIREMENTS/DRIVERS</b></p> <p>Bechtel Jacobs Company LLC Contract DE-AC05-98OR22700, December 18, 1997  Integrated Safety Management System Description, BJC/OR-87, Revision 2, September 1999  Uranium Enrichment Toxic Substance Control Act Federal Facility Compliance Agreement, KY/E-119, March 1992.  Paducah Waste Operations Subcontract 23900-BA-RM005F  10 CFR 835, Occupational Radiation Protection.  29CFR 1910, Safety and Health Regulations for Industry Standards  Applicable DOE Orders  40 CFR 761, TSCA and PCB Regulations  Consult TSCA FFCA, KY/E-119, March 1992, for a description of sites, facilities, and equipment that are under management of this agreement due to releases or potential for releases.  "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"  Safety Analysis Report KY/EM-174, January 1997</p> <p>As applicable, indicate other regulatory-related requirements.  CERCLA: N RCRA: N DNFSB: N DOE Orders: Y AEA: Y UMTRCA: N State: Y Other: Y</p> <p><b>WASTE VOLUMES</b>  Please see attached waste performance metrics, as applicable.</p> <p><b>PROJECT SCHEDULE</b>  Please see attached project summary schedule, project detail schedule, and Milestone Status Summary Report.</p> <p><b>EXECUTION YEAR BASELINE</b>  Please see attached Budgeted Cost of Work Scheduled Plan.</p> <p><b>BASELINE BY YEAR</b>  Please see attached Baseline by Year Report.</p>		