



Department of Energy

Washington, DC 20585

April 5, 2000

MEMORANDUM FOR DISTRIBUTION

FROM: David Michaels, PhD, MPH
Assistant Secretary
Environment, Safety and Health

A handwritten signature in black ink, appearing to read "David Michaels".

SUBJECT: Applicability of Title 10 Code of Federal Regulations, Part 850 (10 CFR 850), Chronic Beryllium Disease Prevention Program (CBDPP) to Workers with Past Beryllium Exposure

This is to advise you of an important issue that was highlighted at the February 29 - March 2, 2000, Chronic Beryllium Disease Prevention Program Plan Development Workshop held in Washington, DC. The issue is the identification of all workers covered by 10 CFR 850, including those who may be working in facilities that have no current or past beryllium activities.

You can disregard the balance of this memorandum if you have confirmed that none of the workers in your Federal or contractor organizations may in the past have been exposed or potentially exposed to beryllium at any Department of Energy (DOE) facility.

Title 10 CFR 850 requires the identification of all workers in Federal and contractor organizations who have had past exposure or potential exposure to beryllium at any DOE facility. Many DOE organizations have assumed that 10 CFR 850 does not apply to them because their facilities do not have, and have not had, any activities involving beryllium. This assumption may not be correct because the rule requires that medical surveillance be offered to all beryllium-associated workers. This includes workers who, in the past, have been exposed or potentially exposed as follows: (1) while they were employed at another DOE facility; (2) while working at one of your satellite facilities; or (3) when visiting another organization's facility.

We know of several workers with signs or symptoms of chronic beryllium disease who receive medical surveillance and who work at DOE facilities that have no current or past beryllium activities. Their managers initiated the medical surveillance because they were aware of the workers' potential prior exposures. However, we are concerned that many DOE and contractor workers in similar circumstances may not receive the medical surveillance required by the rule because their managers do not recognize that the rule applies to these workers.

In order to assist you in meeting 10 CFR 850 requirements, we have attached a list of questions that can be used to identify workers who are covered by the rule. Also attached is a current list of sites that have or have had beryllium activities. Use of the survey is optional, but I recommend that you distribute it to Federal and contractor workers who may have had past actual or potential exposure to beryllium at any DOE facility.



Please recognize that an appropriate CBDPP plan will have to be developed for those organizations where beryllium-associated workers are found even if the organization does not have, and has not had, any activities involving beryllium. These plans, at the very least, will need to comply with the medical, recordkeeping, counseling, and feedback provisions of the rule (10 CFR 850.34-37 and 850.39-40).

Local oversight activities should include a review of actions taken to identify beryllium-associated workers at sites across the Department. Independent oversight investigations by my office will also be evaluating this issue and rule implementation. Please contact Mr. David J. Weitzman on 301-903-5401 or dave.weitzman@eh.doe.gov for further discussion or clarification concerning this issue.

Attachment

DJW 3/28

DJW 3/15

EH-51:Weitzman::3-5401:drj:03/10/00:A:be.exp9

Beitzman #2D: R

Distribution:

Subject File: _____

Weitzman RDR

EH-52 RDR

EH-5 RDR

DUE DATE:

EH _____

ES _____

EH-5-00-01-0179

Correspondence Reviewer:

Tracking _____

EH-52 _____

EH-5 _____

EH-52

RJones



03/15/00

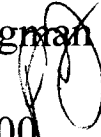
EH-5

JFitzgerald

03/17/00

EH-6

PSeligman



03/20/00

EH-1

DMichaels

03/ /00

MSM-OK

3/30/00

Substantially re-written so as to not require FMC review for giving direction to the field.

Distribution:

PROGRAM SECRETARIAL OFFICERS

Edward J. Curran, CN-1
Thomas F. Gioconda, Acting DP-1
Dan W. Reicher, EE-1
Carolyn L. Huntoon, EM-1
Robert W. Gee, FE-1
George B. Breznay, HG-1
Gregory H. Friedman, IG-1
Lawrence H. Sanchez, IN-1
David M. Klaus, MA-1
Laura S.H. Holgate, MD-1
William D. Magwood IV, NE-1
Rose E. Gottemoeller, NN-1
Glenn S. Podonsky, OA-1
Walter S. Howes, PC-1
Ivan Itkin, RW-1
James F. Decker, Acting SC-1
Eugene E. Habiger, SO-1
Gary K. King, WT-1

MANAGERS, OPERATIONS OFFICES

Richard E. Glass, Albuquerque
Robert L. San Martin, Chicago
Beverly A. Cook, Idaho
Kathleen A. Carlson, Nevada
James M. Turner, Oakland
G. Leah Dever, Oak Ridge
Keith A. Klein, Richland
Gregory P. Rudy, Savannah River

MANAGERS, FIELD OFFICES

Susan R. Brechbill, Ohio Field Office
Paul Golan, Rocky Flats Field Office
Frank M. Stewart, Jr., Golden Field Office
Judith A. Johansen, Bonneville Power Administration
Charles A. Borchardt, Southeastern Power Administration
Michael A. Deihl, Southwestern Power Administration
Michael S. HacsKaylo, Western Power Administration
Rita A. Bajura, National Energy Technology Laboratory
(formerly the Federal Energy Technology Center)

ATTACHMENT

Beryllium-Associated Worker Work History Survey

Many Department of Energy (DOE) organizations have assumed that Title 10 Code of Federal Regulations, Part 850 (10 CFR 850), Chronic Beryllium Disease Prevention Program, does not apply to them because they do not, and have not, had activities involving beryllium at their DOE facilities. However, 10 CFR 850.2 (a)(3) includes as applicable, any current DOE or DOE contractor employee who in the past may have been exposed or potentially exposed to beryllium at any DOE facility. This requirement makes it necessary to identify these workers. The questions below and list of DOE sites known to have current or past beryllium activities should be useful for that purpose. An appropriate chronic beryllium disease prevention program for these workers is required by the rule.

1. Are you currently a DOE contractor or Federal employee who worked in the past at a DOE-owned or leased facility where beryllium was used?
2. If yes, what was:
 - a. The name of the facility and the building you worked in?
 - b. Your job title?
 - c. The type of work you performed?
 - d. The length and date of your employment at that facility?
3. Do you believe that you were exposed or may have been potentially exposed to airborne concentrations of beryllium at the DOE facility?
4. Are you currently participating in a former or current beryllium worker medical surveillance program?
5. If yes, please give the name and location of the former or current beryllium worker medical surveillance program in which you are participating?

PLEASE RETURN THIS COMPLETED FORM BY APRIL 14, 2000 TO:

Name:

Address:

DOE and DOE Predecessor Agency Beryllium Sites

Based on Records Research as of March 16, 2000

<u>DOE Site Name</u>	<u>Management & Operating Contractor</u>	<u>Management & Operating Contractor span dates</u>
Ames Laboratory	Iowa State University	1946-present
Argonne National Laboratory	University of Chicago	1946-present
Brookhaven National Laboratory	Associated Universities, Inc. Brookhaven Science Assoc. (Battelle Memorial Institute and State University of NY at Stony Brook)	1946-1998 1998-present
Burlington Plant (Iowa Army Ammunition Plant)	Mason & Hanger-Silas Mason Co.	1953-1974
Fermi National Accelerator	Universities Research Association	1967-present
Fernald Environmental Management Project (FEMP) formerly Feed Materials Production Center (FMPC)	Westinghouse Flour Daniel, Fernald	1953-1995? 1995?-present
Hanford (a.k.a. Hanford Engineer Works)	E.I. Du Pont de Nemours & Co. General Electric Isochem, Inc. Atlantic-Richfield Hanford Co. Rockwell Hanford Corp. Douglas United Nuclear United Nuclear Industries UNC Nuclear Industries, Inc. Westinghouse Hanford Flour Daniel	1943-1946 1946-1965 1965-1967 1967-1977 1977-1987 1965-1967 1967-1973 1973-1987 1987-1994 1994-present Chemical Processing Chemical Processing Chemical Processing Reactor Operations Reactor Operations Reactor Operations

Kansas City Plant	Allied-Signal Aerospace	1949-1991	(formerly Bendix)
Knolls Atomic Power Laboratory	General Electric Co.	1947-present	
Lawrence Berkeley National Laboratory	University of California	1943-present	
Lawrence Livermore National Laboratory	University of California	1952-present	
Los Alamos National Laboratory	University of California	1943-present	
Mound Plant	Monsanto Chemical Co. EG & G Mound Applied Technologies Babcock & Wilcox	1947-1988 1988-1993 1993-present	
Nevada Test Site	Reynolds Electrical and Engineering Co., Inc. (REECO) Bechtel, Nevada	1952-1995 1996-present	
Oak Ridge Site (a.k.a. Clinton Engineer Works) Oak Ridge National Lab. (a.k.a. Clinton Laboratories)	University of Chicago Monsanto Chemical Co. Union Carbide & Carbon Corp. Martin Marietta Energy Systems Lockheed Martin Energy Research Corp.	1943-present 1943-1945 1945-1947 1948-1984 1984-1994 1994-present	
K-25 gaseous diffusion plant (a.k.a. East Tennessee Technology Park)	Union Carbide & Carbon Corp. Martin Marietta Energy Systems Lockheed Martin Energy Systems, Inc.	1943-1984 1994-1994 1994-present	
Y-12	Tennessee Eastman Corp. (TEC) Union Carbide & Carbon Corp. Martin Marietta Energy Systems Lockheed Martin Energy Systems	1943-1947 1947-1984 1984-1994 1994-present	

Pacific Northwest National Laboratory	Battelle Memorial Institute	1965-present
Pantex Plant	Proctor & Gamble Mason & Hanger -Silas Mason Co.	1951-1956 1956-present
Pinellas Plant	General Electric Martin Marietta Specialty Components, Inc.	1957-1993 1993-1997 (closed)
Rocky Flats Plant	Dow Chemical Co. Rockwell Int. EG&G Kaiser-Hill	1951-1975 1975-1989-(Atomics International Division) 1990-1994 1995-present
Sandia National Laboratory	AT & T Martin Marietta Lockheed Martin	1949-1993 1993-1995 1995-present
Savannah River Site	E. I Du Pont de Nemours & co. Westinghouse Savannah River	1951-1989 1989-present
Schenectady Naval Reactors	General Electric	1948-present
Stanford Linear Accelerator Center (SLAC)	Stanford University	1962-present
University of Rochester Atomic Energy Project	University of Rochester	1943-1973