

Hanford Site Contractor
Chronic Beryllium Disease Prevention Program

Rev. 4

June 12, 2003

Prepared for:

U.S. Department of Energy
Richland Operations Office and
Office of River Protection
Richland, Washington

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1.0. PURPOSE

The purpose of the Hanford Site Contractor Chronic Beryllium Disease Prevention Program (CBDPP) is to establish a coordinated system among the Hanford Site contractors to protect worker health and comply with 10 CFR 850. For simplicity, the Hanford Site Contractor Chronic Beryllium Disease Prevention Program will be referred to as the Beryllium Program throughout this document. Hanford Prime Site contractors are referred to as Hanford Site contractors throughout the remainder of this document.

Exposure to beryllium may produce diseases such as berylliosis and cancer. Ongoing studies have revealed that workers exposed to levels below the current Occupational Safety and Health Administration (OSHA) beryllium permissible exposure limit (Be PEL) can develop a sensitivity to beryllium, which places them at an increased risk of subsequently developing chronic beryllium disease (CBD). Measures will be implemented to reduce exposures as low as practicable.

2.0. SCOPE

The Beryllium Program applies to Hanford Site contractors who are responsible for facilities where beryllium operations have previously been conducted and to any current operation, including decommissioning and demolition that involves airborne beryllium exposures. In addition, the Beryllium Program applies to the release of equipment, salvage, and other material from these facilities, and to the release of facilities for use by others. It does not apply to beryllium articles as defined in Section 4.0. This Beryllium Program does not apply to current or future laboratory or laboratory-scale operations (as defined by OSHA) involving beryllium that are subject to the requirements of 29 CFR 1910.1450, "Occupational Exposure to Hazardous Chemicals in Laboratories." However, present laboratory use of beryllium will be documented on facility fact sheets.

The Beryllium Program covers Hanford workers who have previously been exposed or currently have the potential for exposure to beryllium while working at DOE sites.

3.0. RESPONSIBILITIES

Each Hanford Site contractor will comply with the requirements of the Beryllium Program, and develop a mechanism to implement these requirements. This mechanism is referred to here as a contractor attachment, though it may be a procedure or other company-implementing document. These attachments will be controlled documents, and the Beryllium Program for each Hanford Site contractor will consist of a combination of the Hanford Site contractor CBDPP and their attachment. When a significant change is made to the Site CBDPP, the new Site CBDPP will be submitted to DOE for approval. Contractors will have 90 days from the effective date of the new Site CBDPP to review their

attachments and update their attachments as needed. If significant changes to a contractor attachment are made, the revised attachment will be submitted to DOE for review and approval, and to the FH Team Beryllium Program Coordinator (BPC) who will review it for consistency with the Site CBDPP. The contractor attachment is a mandatory supplement to the Beryllium Program. It contains the details and the implementation plan to comply with 10 CFR 850 including the following items:

- Integrating elements of the Beryllium Program into existing programs for safety, health, training, and work activity planning;
- Assessing beryllium exposure hazards before work activities are conducted and ensuring that control measures, monitoring equipment, and personal protective equipment are adequate to protect human health and the environment;
- Ensuring that beryllium waste is disposed of in a manner that minimizes the potential for worker exposure and that containers of beryllium waste are appropriately labeled;
- Maintaining a record keeping system for beryllium records that protects the confidentiality of workers while allowing the records to be transmitted to DOE upon request;
- Identifying facilities where beryllium is or has been used and assessing the potential for exposure and maintaining this facility list;
- Providing current workers who are or have been exposed to beryllium with training, counseling and the opportunity for appropriate diagnosis and medical treatment with full disclosure of the consequences as described in the Informed Consent Form (10 CFR 850, Appendix A);
- Implementing an exposure reduction and minimization program to ensure that beryllium exposure is maintained as low as practicable; and
- Assessing the effectiveness of the beryllium control programs and providing performance feedback to affected workers and groups.

Because each contractor has a different work scope, their attachments will address each of the compliance aspects of 10 CFR 850 differently. For example, a contractor who has no employees with the potential for current beryllium exposure (because of the type of work they are currently doing) would not need to address certain aspects of the Rule such as regulated areas, lunchroom facilities, waste disposal, and beryllium emergencies. The following paragraphs provide a brief summary of the types of work being performed by each Hanford Site contractor.

Fluor Hanford: Fluor Hanford is not currently performing any production work with beryllium or beryllium alloys. However, because of past beryllium contamination, there is a small potential for beryllium exposure during certain work tasks in identified facilities that may include demolition of facilities. The FH beryllium procedure focuses on employees with past exposure, and the potential for low-level exposure from contact with beryllium contamination.

Bechtel Hanford, Inc.: The scope of beryllium activities conducted by the Environmental Remediation Contractor presently includes the inspection, maintenance, transition and demolition of

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Beryllium-Suspect Facilities where employees may come into contact with beryllium-contaminated materials such as floor surfaces, ventilation ducts, ceiling tile, and light fixtures. This includes all temporary construction and activities pursuant to facility transition, inspection, maintenance, repair, hazard characterization, hazard remediation, preparation for demolition, salvage and disposal of contaminated equipment or material. These activities are classified in 10 CFR 850.30 as non-operational. Subcontractors who work in these facilities must comply with the requirements of 10 CFR 850.

Pacific Northwest National Laboratory (PNNL): All current beryllium tasks at PNNL involve either laboratory use of beryllium or work with beryllium articles. In addition, PNNL manages facilities in which there is some historical evidence that beryllium may have been used in the past. Characterization sampling in these facilities indicates that there are portions of facilities with low levels of residual beryllium contamination. Demolition or remodeling work in these facilities or repair, maintenance or removal of closed systems, such as hoods and ductwork where beryllium has been used in laboratories may have the potential to produce airborne beryllium particulate or particles. Most contamination outside closed systems has been cleaned below the release criteria.

CH2M Hill Hanford Group, Inc. (CH2M HILL): CH2M HILL does not have a work scope where it is using or processing beryllium or materials containing beryllium. Historically, beryllium use in the Tank Farms was limited to the use of non-sparking beryllium alloy tools. These non-sparking beryllium alloy tools were recently replaced with a suitable substitute and use of beryllium-alloy tools in the tank farms has been prohibited.

Low levels of beryllium may potentially be present in the liquid tank wastes stored in underground tanks. Existing radiological controls to protect workers from potential exposures to radiological materials and toxic gasses and/or vapors are more than adequate to protect workers from potential beryllium exposures.

Hanford Environmental Health Foundation (HEHF): HEHF is the Occupational Medical Contractor at the Hanford Site. HEHF does not have a work scope where it is using or processing beryllium or materials containing beryllium. Therefore, many sections of 10 CFR Part 850, "Chronic Beryllium Disease Prevention Program (CBDPP) does not apply to HEHF. In Section 2.0 Requirements, in the HEHF Attachment to the Hanford Site Contractor's CBDPP, a matrix listing requirements will reflect the work scope of HEHF.

In providing Occupational Medical Services to Hanford Site contractors, it may be necessary for one or more of these HEHF employees to enter facilities covered by the responsible contractor's CBDPP. HEHF employees entering such facilities will comply with the CBDPP of the facility visited.

The HEHF Policies and Procedures Writer will maintain the record copy of the HEHF contractor attachment. This individual will also be responsible for issuing revision numbers and maintaining all revisions of the HEHF contractor attachment.

Each Hanford contractor has employees that self-identified either through a Beryllium Questionnaire or

the DOE Historic Health Exposure Questionnaire, as having been exposed or potentially exposed to beryllium in the past. These individuals are in the Beryllium: Previous Exposure Medical Program.

Each Hanford Site contractor will manage and control beryllium exposures in DOE facilities consistent with both this program and associated contractor-specific attachments. Contractors will be in compliance with both of these documents by their effective dates and before initiating any beryllium-related activities. Workers may not take or cause any action inconsistent with the requirements of 10 CFR 850, the Beryllium Program, their applicable attachment, or any other Federal statute or regulation concerning the exposure of workers to beryllium at DOE facilities. No task involving potential exposure to airborne beryllium that is outside the scope of either the Beryllium Program or the applicable attachment of the individual contractor may be initiated until an update of the appropriate document has been approved. Exceptions will be approved by the responsible DOE Field Office Manager. Each Hanford Site contractor is responsible for subcontractor compliance with this program.

The Beryllium Program will be reviewed annually, updated as needed by representatives from each Hanford Site contractor, and approved by DOE as necessary and required by 10 CFR 850. Members of worker beryllium groups and DOE staff will be invited to participate in this process. Each contractor's attachment will be maintained by the contractor, and updated whenever significant changes occur. Copies and revisions of both the Beryllium Program and the contractor attachments will be made available to labor organizations representing Hanford workers by the responsible contractor.

4.0. DEFINITIONS

- *Action level*: refers to the level of airborne beryllium exposure (0.2 ug/m^3 as an 8-hour time-weighted average) above which protective measures outlined in 10 CFR 850.23 shall be implemented.
- *Beryllium*: refers to elemental beryllium and any insoluble beryllium compound or alloy containing 0.1 percent beryllium or greater that may be released as an airborne particulate.
- *Beryllium activity*: refers to an activity taken for, or by, DOE at a DOE facility that can expose workers to airborne beryllium, including but not limited to design, construction, operation, maintenance, or decommissioning, and which may involve one DOE facility or operation or a combination of facilities and operations.
- *Beryllium affected*: an individual who has been diagnosed with beryllium sensitization or chronic beryllium disease.
- *Beryllium article*: means a manufactured item that is formed to a specific shape or design during manufacture that has end-use functions that depend in whole or in part on its shape or design during end use and that does not release beryllium or otherwise result in exposure to airborne concentrations of beryllium under normal conditions of use.
- *Beryllium assigned worker*: refers to a current worker who has been assigned by his/her manager to perform work that is anticipated to involve exposure to airborne beryllium at or above 0.01 ug/m^3 . Such an exposure is likely to be on an infrequent basis. Their EJTA shall

reflect that the worker is a Beryllium Assigned Worker. No current beryllium exposure should occur for any employee who is not a beryllium assigned worker.

- *Beryllium associated worker*: refers to a current worker of a Hanford Site contractor or their subcontractors who is or was exposed or potentially exposed to airborne concentrations of beryllium at a DOE facility including:
 - A current beryllium worker (currently working at Hanford or on disability); or
 - A current worker whose work history shows that the worker may have been exposed to airborne concentrations of beryllium at a DOE facility ("previous worker"); or
 - A current worker who exhibits signs or symptoms of beryllium exposure; or
 - A current worker who is receiving medical removal protection benefits.Individuals no longer working at Hanford ("former workers") are not covered by this program.
- *Beryllium-cleared facility*: a facility where beryllium may have been present in the past, but a review of historical records indicate that no operations were performed to generate beryllium particulate (such as grinding, welding or brazing), and where beryllium characterization sampling has demonstrated that all surface beryllium levels are less than 0.2 ug/100 cm².
- *Beryllium-contaminated material*: refers to equipment and/or items that were:
 - Used in beryllium production work, or
 - Discovered to have surface contamination levels greater than 0.2 ug/100 cm² or the background level for local soils (dust), whichever is greater.
- *Beryllium-controlled area*: a facility or an area within a facility where beryllium surface contamination levels are known to exceed 0.2 ug/100 cm² and an evaluation has been performed indicating that airborne beryllium exposures are possible during routine work in the area.. These areas will be posted to indicate the presence of beryllium, and access will be controlled.
- *Beryllium facilities list*: refers to the listing of locations at Hanford where the presence of beryllium has been evaluated. This listing is equivalent to the baseline beryllium inventory required in 10 CFR 850.20.
- *Beryllium medical recommendation*: Site Occupational Medical Director (SOMD) provides a written medical opinion to the contractor (via a permanent medical restriction) recommending that a worker's future occupational airborne beryllium exposure be kept below an 8-hour TWA of 0.01 ug/m³. As a matter of health and safety policy, the Hanford SOMD have created a new airborne action level for medical restriction/removal purposes that is 20 times more protective than required by the 10 CFR 850 regulations.
- *Beryllium medical removal*: when the contractor receives a beryllium medical recommendation for a beryllium affected worker, the employee will be offered a beryllium medical removal (per 10 CFR 850.35) if they are currently working as a beryllium assigned worker. The designation

of these workers will be changed to Beryllium: Previous Exposure workers and their EJTA updated to reflect this change.

- *Beryllium regulated area:* refers to an area demarcated by a Hanford Site contractor in which the airborne concentration of beryllium exceeds, or can reasonably be expected to exceed, the action level.
- *Beryllium work restriction:* when the contractor receives a beryllium medical recommendation, a permanent work restriction will be implemented to comply with the recommendation. The purpose of this restriction is to prevent both current and future employee exposure to airborne beryllium and the wording on the work restriction will state that the employee is not to be exposed to airborne beryllium levels which are at or above an 8-hour TWA of 0.01 ug/m³. The restriction will be implemented whether the employee has any potential for beryllium exposure in the current job.
- *Contractor attachment:* refers to a Hanford Site contractor-specific document containing additional details of the Beryllium Program, and specifying how the Beryllium Program will be implemented by that contractor.

5.0 ELEMENTS OF THE BERYLLIUM PROGRAM

5.1 Beryllium Facilities List

Hanford Site contractors will evaluate each building or facility where beryllium operations are known or suspected to have been conducted to determine the presence of beryllium contamination. The presence or absence of beryllium will be determined by applying historical process knowledge and/or by collecting surface smear samples. Characterization of a facility shall include those areas of the facility where beryllium is known or suspected to have been used. Where a historical review of beryllium operations indicates that beryllium particulates were generated in the facility, areas of a facility that are not routinely accessed, such as areas above 8' elevation and closed ventilation systems, will be characterized as needed for business reasons (building renovation, facility D&D, etc.). All surface sampling shall have a detection limit of 0.2 ug/100 cm² or less, and shall be performed using a wet wipe method. If past surface sampling was performed in a facility with higher detection limits, the facility will be considered to be possibly contaminated until additional sampling is performed using a detection limit of 0.2 ug/100 cm² or lower. This information will establish the Hanford Beryllium Facilities List. This inventory will be maintained by a qualified individual (e.g., a certified industrial hygienist) for Fluor Hanford on the Internet (<http://www.hanford.gov/safety/beryllium/curnotes.htm>), reviewed annually, and revised as more information is gathered as a result of building walk-downs, detailed area evaluations, and finally facility decontamination and demolition.

5.2 Hazard Assessment

Hanford Site contractors will develop a risk-based method for assessing the beryllium exposure

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hazards. Assessments will include an analysis of existing conditions, exposure data, medical surveillance trends, and the exposure potential of planned activities. The specific process to be utilized for performing this assessment will be detailed by contractors in their respective contractor attachment. The individual managing this assessment will be qualified, e.g., a certified industrial hygienist, and individuals assigned to this task will have sufficient knowledge and experience to perform such activities properly.

Workers whose work activities involve the potential for airborne beryllium exposure will be designated as beryllium assigned workers by their supervisor. This will be performed using the Employee Job Task Analysis (EJTA) and these employees will be enrolled in a medical monitoring program and beryllium training in accordance with Sections 5.5 and 5.6. All current workers who may have been exposed to beryllium from past operations will be offered an opportunity to enroll in a beryllium monitoring program as discussed in Section 5.5.

Hanford Site contractors will develop a list of existing and planned operational tasks that are within the scope of the Beryllium Program. This list will be contained in the contractor attachment. Other general Beryllium Program requirements contained in 10 CFR 850.11 (b) will be included in the contractor attachment.

Hanford Site contractors will assess the risk of worker exposure to beryllium in current operations for which they are responsible. Hanford Site contractors will comply with applicable State, Federal, and U.S. Department of Energy (DOE) occupational safety and health regulations with respect to beryllium.

Work planning and exposure controls will be implemented to maintain employee exposures as low as practicable. Areas in facilities which have the potential for current beryllium exposure based on past beryllium work shall be treated as a precaution as a potential beryllium contamination area until beryllium surface sampling has been performed with a detection limit of 0.2 ug/100 cm². Prior to work being performed in areas with known beryllium surface contamination levels above 0.2 ug/100 cm², the potential for airborne beryllium exposure levels above 0.01 ug/m³ will be evaluated and documented. If this evaluation indicates that airborne beryllium contamination will not occur during routine work, the area will be posted as "Known Beryllium Contamination – Airborne Beryllium Exposure Unlikely." If this evaluation indicates that airborne beryllium exposures are likely during routine operations, the area will be posted as a beryllium controlled area, the work will be performed by beryllium assigned workers, and appropriate controls will be implemented as directed by the occupational safety and health professional to reduce exposure. If airborne beryllium levels are above the action level listed in this plan, beryllium-regulated areas will be established until the airborne beryllium level has been shown to be below the action level. All airborne sampling will be performed with a limit of detection of 0.01 ug/m³ or lower based on an eight-hour Time-weighted average (TWA) sample.

Any contractor whose operations could result in an uncontrolled release of beryllium will comply with 10 CFR 850.33. The mechanism of how beryllium emergencies will be addressed

will be contained in the contractor attachment.

5.3 Exposure Monitoring

A qualified individual, e.g., a certified industrial hygienist, will manage exposure monitoring. Individuals assigned to perform monitoring will have sufficient industrial hygiene knowledge and experience to perform such activities properly. Both surface wipe sampling and airborne beryllium monitoring will be used to obtain information on beryllium levels. Although wipe sampling does not provide a direct indication of beryllium airborne employee exposure levels, it does provide information on the potential for exposure. The decision to perform exposure monitoring will be based on a review of the work to be performed including specific beryllium tasks and previous beryllium sampling results. The contractor will collect personal breathing zone samples using a statistically based monitoring strategy, with the details of the strategy contained in their contractor attachment. Periodic monitoring will be performed on workers whose airborne concentrations of beryllium are at or above the action level. Airborne monitoring results that are representative of employee exposure will be provided to the employee. If exposure levels exceed the action level, this notification will include corrective actions to be taken to reduce exposure levels.

5.4 Exposure Risk Reduction and Minimization

Worker airborne beryllium exposure levels at or above the action level require a formal exposure reduction and minimization program. Beryllium regulated areas, hygiene facilities and practices, and respiratory protection will be provided as required in 10 CFR 850.26-28, and implemented through the contractor attachment. Beryllium-controlled areas will be established as required by the CBDPP. If initial exposure monitoring indicates airborne beryllium exposure levels that are above the detection limit of the sampling method but below the action level, the contractor will evaluate the feasibility of implementing measures to reduce exposure.

Prior to work in closed systems (e.g., hoods or exhaust systems or areas with potential beryllium contamination, an assessment of the potential for beryllium exposure will be performed. If the hazard assessment indicates that beryllium exposure is likely, actions will be taken to reduce the potential for worker exposure to beryllium. Access to controlled areas will be restricted. Protective clothing and equipment will be used as outlined in 10 CFR 850.29. Routine surface sampling will be conducted as outlined in 10 CFR 850.30(a).

Hanford has no facilities that are currently involved in beryllium production work. Therefore, equipment will not be released for use in beryllium production facilities. Decontamination of beryllium-contaminated equipment to be released to the public or for use in uncontaminated areas will be performed to the criteria specified in 10 CFR 850.31. Beryllium waste will be disposed of as outlined in 10 CFR 850.32. Because beryllium is not a characteristic or toxic waste under Resource Conservation and Recovery Act (RCRA) regulations, no special disposal requirements are required beyond those specified in 850.32.

Hanford Site contractors will ensure that beryllium regulated areas have warning signs to warn

workers of beryllium hazards. Warning labels will be affixed to containers of beryllium, beryllium compounds, or beryllium-contaminated materials. These signs and labels will comply with 10 CFR 850.38. In addition to posting regulated areas, Hanford has chosen to post areas that have a current potential for beryllium exposure. To ensure consistency across the Site, a standard format has been developed for beryllium signs for these facilities. The sign is black and yellow, with the wording shown below. The area covered by the posting will depend on the size of the area of potential contamination and could include the entire facility. The posting will indicate the area of contamination, whether the contamination is known or potential, and a person to contact for additional information on beryllium sampling results for the area (if the results are not posted at the facility). Posting results or summaries are a recommended method of communicating the information to all workers. In addition, if the area is locked, the person to contact for access will be posted.

Potential Beryllium Contamination Area Posting

CAUTION POTENTIAL BERYLLIUM CONTAMINATION

contain(s) **POTENTIAL** beryllium contamination.

Contact _____ for sampling results and specific locations where beryllium contamination may exist. No work should be performed in these areas without evaluating the potential for beryllium exposure.

Known Beryllium Contamination Area – Airborne Beryllium Exposure Unlikely Posting

CAUTION – KNOWN BERYLLIUM CONTAMINATION – AIRBORNE BERYLLIUM EXPOSURE UNLIKELY

contain(s) **KNOWN** beryllium contamination. An evaluation of the potential for airborne exposure has been performed and indicates that such exposure is unlikely during normal work operations around these materials. If work is planned that involves dust-disturbing activities directly on these materials, (such as grinding, sanding, welding, etc), the potential for airborne beryllium exposure should be reevaluated prior to performing the work. Additional information on the sampling and evaluation results can be obtained as indicated below.

Known Beryllium Contamination Area - Beryllium Controlled Area Posting

CAUTION – KNOWN BERYLLIUM CONTAMINATION – BERYLLIUM CONTROLLED AREA

contain(s) KNOWN beryllium contamination and have been designated as BERYLLIUM CONTROLLED AREAS. If access is needed into these areas, or additional information is desired on sampling results, they can be obtained as indicated below.

5.5 Medical Surveillance, Consent and Removal from Potential Exposure

The Site Occupational Medical Contractor (SOMC) in accordance with 10 CFR 850.34 will provide medical surveillance for beryllium workers at the Hanford site. While the primary responsibility for medical surveillance rests with the responsible contractor, the SOMC will perform most of the medical surveillance actions called out in the rule under their contract with the DOE. Specific components of the medical surveillance program that will be performed or administered by site contractors will be detailed in their individual appendices.

The SOMC will perform the following medical surveillance activities:

- compile and maintain a list of beryllium-associated workers who may be eligible for protective measures. This list will consist of 1) workers identified on contractors' Employee Job Task Analysis forms as beryllium-assigned workers; 2) current workers who have either self-identified or who have been identified by the contractor as having previous beryllium exposure.
- provide a medical monitoring program for beryllium-associated workers in accordance with 10 CFR 850. Baseline and annual medical evaluations will be provided to current beryllium (beryllium assigned) workers. Baseline and periodic voluntary examinations will be provided at least every three years to workers who may have had previous exposure to beryllium. Content of the exams including ancillary testing to screen for beryllium sensitivity or chronic beryllium disease is outlined in the SOMC Medical Support Plan, which is an attachment to the Hanford Site contractor CBDPP.
- provide a summary of the medical surveillance program to workers prior to the medical evaluation in accordance with 10 CFR 850.35. The SOMC will obtain, in accordance with 10 CFR 850.36, the worker's signature on the informed consent form before performing medical evaluations or any tests.
- provide emergency medical evaluations as soon as possible to any workers who may have been exposed to beryllium because of an emergency in accordance with 10 CFR 850.34. General contents of the exam are outlined in the SOMC Medical Support Plan.

- participate in the multiple physician review process in accordance with 10 CFR 850.34. Contractors will notify workers of their rights and responsibilities regarding the multiple physician review process in accordance with 10 CFR 850.34. The SOMC will provide examination and laboratory reports to any physician providing a second or third evaluation.
- provide each contractor and beryllium-assigned worker a written, signed medical opinion within 10 working days of the receipt of medical tests or procedures in accordance with 10 CFR 850.34. For workers with possible previous exposure to beryllium, the contractor and the worker will both receive written notification of any positive beryllium test; however, only the worker will receive notification of normal tests as there would be a violation of their right to privacy if the contractor were sent the normal test.

Each worker who is diagnosed with beryllium sensitization or CBD will be offered an opportunity to meet with a medical professional and a health and safety professional to answer questions. This process will be coordinated by the contractor case management representative. During this meeting, the worker will be offered beryllium monitoring (airborne or surface) to measure routine beryllium levels in the worker's primary work area.

Hanford Site contractors will offer temporary or permanent medical removal from further beryllium exposure as determined in the medical opinion and in accordance with 10 CFR 850.35. The SOMC will develop and update a medical restriction appropriate for the worker who is sensitized to beryllium or who has chronic beryllium disease. The standard site medical restrictions for Hanford workers can be found in the SOMC Medical Support Plan. The SOMC will provide consultation to the worker prior to medical removal and/or medical restriction in accordance with 10CFR 850.35. The SOMC will provide a written medical opinion to the contractor recommending return to work in accordance with 10 CFR 850.35. The SOMC will provide psychological support for beryllium-sensitized individuals and those with chronic beryllium disease.

5.6 Training

Hanford Site contractors will provide beryllium training and counseling to their workers as outlined in 10 CFR 850.37. This training will include general beryllium awareness training as well as more detailed training for beryllium-assigned workers. The details of this training will be contained in the contractor attachment.

5.7 Record Keeping

Hanford Site contractors will maintain accurate beryllium records as outlined in 10 CFR 850.39 and 10 CFR 850.34(g). The SOMC will maintain worker beryllium medical records and furnish reports to each contractor as required by the Rule. The contractors shall treat these data as confidential. Records shall not be released to other parties if the identity of the individual is contained on the record. Medical information shall be maintained by the SOMC. Both the SOMC and the individual contractors shall maintain beryllium records in an electronic format if practicable. In addition, the SOMC will maintain a beryllium registry for the Hanford Site in accordance with 10 CFR 850.39(h). Each prime contractor will provide data for this registry upon request of the SOMC, who is responsible for submitting the data to the Office of Epidemiologic Studies.

5.8 Performance Feedback

Assessments will be performed to establish the effectiveness of the Beryllium Program elements. If this assessment (or feedback from DOE) indicates that the Beryllium Program needs to be revised, an update will be performed. This information will be communicated to affected organizations and individuals. This process will comply with the requirements outlined in 10 CFR 850.40, with the details of the performance feedback program contained in the contractor attachment.

6.0 HANFORD SITE-WIDE BERYLLIUM GROUPS

6.1 Hanford Beryllium Steering Group

The Hanford Beryllium Steering Group is composed of members from each site prime contractor, the Site Occupational Medical Contractor (HEHF), DOE and the Beryllium Awareness Group (see below). This group was formed to develop the original Hanford Site CBDPP. The continuing mission of the Group is to discuss beryllium items that affect multiple contractors as well as provide periodic updates to the Site CBDPP.

6.2 Hanford Beryllium Awareness Group

The Beryllium Awareness Group is composed of current and former beryllium affected individuals. The Group is supported by DOE, its contractors and HAMTC. The purposes of the Group are to:

1. Provide information and support for current and former beryllium affected employees and family members;
2. Provide input on training and services;
3. Be a resource to others on beryllium issues;
4. Provide feedback to contractor management and DOE.

A copy of the Group Charter that was current when this CBDPP was approved is attached as an appendix. However, this charter is subject to periodic reviews and updates by the Group. A current charter can be found on the website at <http://www.hanford.gov/safety/beryllium/index.htm>.

7.0 REFERENCES

29 CFR 1910.1450. Occupational Safety and Health Administration. "Occupational Exposure to Hazardous Chemicals in Laboratories." U.S. Code of Federal Regulations.

10 CFR 850. Chronic Beryllium Disease Prevention Program; Final Rule. December 8, 1999. FR68854.