

Environmental Restoration Disposal Facility

Waste Disposal Operations



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Security Plan

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1.0 Purpose and Scope

1.1 Purpose

The purpose of this security plan is to identify the security measures taken to protect the Hanford Environmental Restoration Disposal Facility (ERDF) and its associated equipment. Waste Management Federal Services Inc. (WMFS) has responsibility for control of the ERDF Site and will implement the requirements identified in the plan.

1.2 Scope

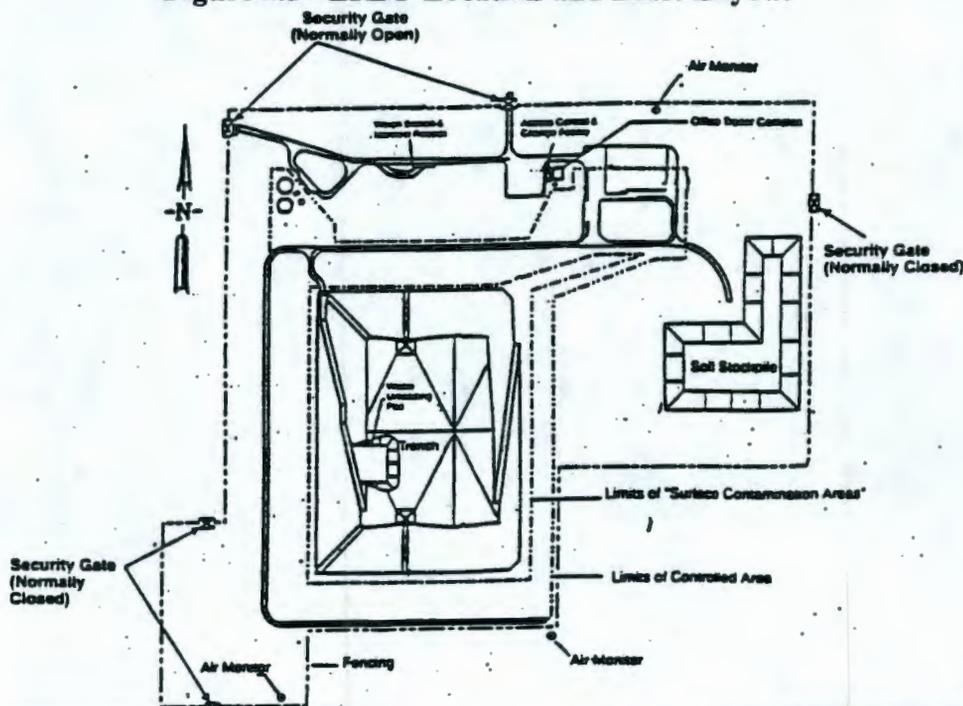
The ERDF Waste Disposal Operations involve the transportation and placement of Hanford Environmental Restoration wastes into an engineered landfill. The scope of this plan includes security measures within the confines of the ERDF. The requirements of this plan apply to all personnel desiring access to the ERDF Site, including employees of WMFS, Bechtel Hanford, Inc. (BHI), U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency, Region X (EPA), and other personnel/visitors.

2.0 Location and Construction

2.1 Location

The ERDF Site is located in the southeast corner of the Hanford 200 West Area and is surrounded by a self-containing fence (see Figure 2.1). The site has the potential for expanding to allow additional disposal cell capacity and the boundaries will be increased to encompass the entire site.

Figure 2.1 - ERDF Location and Basic Layout



2.2 Facilities and Construction

The ERDF Site contains the following fixed facilities: Operations trailer, shower/change trailer, and radiological controls technician trailer. The ERDF landfill cells and associated systems (i.e., scale, leachate collection, utilities, etc.) Are also encompassed within the ERDF facility boundaries.

2.2.1 Operations Trailer - The operations trailer is the focal point for ERDF operations management and is a mobile trailer construction with a size of 48' by 60'. All visitors will be required to report to this trailer for access to the ERDF Site. The trailer is secured by locking doors at the entrance and side doors.

2.2.2 Shower/Change Trailer - The shower/change trailers are the main operations personnel area with change and shower facilities. The trailers are of mobile trailer construction with a size of 12' by 56' plus 24' by 40'. The trailers are secured by locking doors at all three potential entrances, but are normally not locked.

2.2.3 Decon Pad Trailer - The decon pad trailer is the focal point for RCT operations and is of mobile trailer construction with a size of 10' by 36'. The trailer is secured by locking doors at both entrances.

3.0 Security Administration

The WMFS Project Manager is responsible for overall administration of the ERDF specific security plan and will appoint a security administrator to be responsible for day-to-day operations (including key control).

4.0 Personnel Security

4.1 General Site Personnel

General ERDF Site personnel are required to have appropriate badging/dosimetry issued by BHI/DOE-RL as required for their particular work activities. Badges are to be worn at all times in plainly visible areas above the waist. Identification of a person who is not in possession of the appropriate bade will be handled by contacting the Hanford Site Patrol at 373-3800.

4.2 Visitor Entry/Log

Visitors to the ERDF Site are required to check in at the operations trailer and sign the visitor log as posted on the entrance road to the ERDF Site. Visitors will be checked for appropriate badging (provided by BHI/DOE-RL), training, and dosimetry as required for the areas of entry requested. Access to the landfill facility itself (one hot operations are initiated) requires valid "need to enter," proof of appropriate OSHA 1910.120 and radiological controls training, appropriate dosimetry, HASP and AHA Orientation, and facility specific escort. Visitors who are not in possession of the appropriate bade will be handled by contacting the Hanford Site Patrol at 373-3800. Visitors who have a badge,

but not the appropriate need to enter, proof of training, or dosimetry will be allowed to enter the uncontrolled areas of the site, but will not be allowed within the posted exclusion zones.

4.3 Prohibited Articles

Personnel on the ERDF Site are required to comply with the Hanford prohibited articles requirements. WMFS personnel with a need to possess a prohibited article will contact the WMFS project manager to pursue the appropriate pass from BHI. Other personnel should consult their appropriate management to obtain a Hanford Site prohibited article pass. Any prohibited articles found onsite not in possession of a person with an approved pass will be handled by contacting the Hanford Site Patrol at 373-3800.

4.4 Personnel Security Incident Investigation

Investigating and reporting of security incidents will be performed in accordance with Hanford Site procedures and guidelines. The WMFS project manager is responsible for ensuring that an appropriate investigation occurs and is documented due to the site being controlled by WMFS.

5.0 Security Training

5.1 Hanford Site Training

All regular ERDF employees shall attend the Hanford Site training necessary to maintain their individual security clearance and site access badging.

5.2 ERDF Specific Security Knowledge

All permanently assigned personnel shall acquaint themselves with the requirements outlined in this plan and are personally responsible for compliance. Personnel escorting visitors shall also ensure that the visitors comply with the requirements of this security plan.

6.0 Telecommunications

Discussions of classified or controlled information over the standard ERDF telephones is strictly forbidden. There are no secure telephone units installed at ERDF.

7.0 Technical Security

Possession of classified information at ERDF or use of Automatic Data Processing (ADP) equipment for processing classified information at ERDF is strictly prohibited.

8.0 Routine Access

Routine access to the ERDF Site and its facilities will be controlled through locks and keys being issued to only authorized personnel. Dual locks have been installed to allow access control either by WMFS or BHI/RCI. Locks will also be installed on each of the entrances to the trailers installed onsite. No locks will be provided for individual doors within the trailers, although a locking area will be provided for control of radiological survey instruments and sources.

8.1 Key Control

A key control procedure (Appendix B) will be implemented for controlling keys to the identified main control points (i.e., gate, trailers, and localized storage). Access keys to the overall site will be controlled to the WMFS key personnel (project manager, operations supervisor, waste acceptance manager, and ES&H manager), Hanford Patrol, and Hanford Fire Department. An on-call manager will be accessible at all times when the ERDF site is not occupied through either their home residence or the on-call beeper (see appendix C for telephone numbers).

Keys to the individual trailers and/or controlled storage areas will be issued on an as-needed basis. Standard policy will be to open the trailers upon opening the main gate 30 minutes prior to normal working hours. The main gate and trailers will be locked within 30 minutes after the completion of normal working hours. Temporary keys will be issued on an as-needed basis from the on-call key person for exempt individuals requiring access to work during off-hours. A sustained demonstrated need may lead to a key being issued to an individual, as determined by the WMFS Project Manager or the BHI Site Technical Representative.

9.0 Inspections

9.1 Routine Inspections

Routine inspections are not planned as part of ERDF operations. The right is reserved, however, to search packages, boxes, briefcases, and similar articles (containers) carried by or in the possession of visitors/employees. This check would be to ensure that prohibited articles are not introduced to the site and government/company equipment is not removed from the ERDF Site unless authorized.

There is a right on the part of any visitor to refuse inspection/search at the ERDF. Failure or refusal to comply with an inspection request will result in denial of access to ERDF. Failure to comply with inspection request upon exit will require that the Hanford Site Patrol be contacted to resolve the issue and ensure that government/corporate equipment is not being removed without authorization.

9.2 Prohibited Articles

A list of prohibited items is posted at the main entrance to the Hanford Site. None are required at the ERDF Site.

10.0 Physical Security

The ERDF Site is not equipped with a physical security system other than fencing surrounding the site, access gates, and associated locks. Physical security for ERDF revolves around control of the facility when it is not occupied (i.e., during off-normal working hours) and security actions to be taken during unusual incidents when the site is occupied requiring either evacuation, assistance by security forces, or control of radiation generating devices.

10.1 Site Security Inspections

Periodic perimeter checks of the ERDF fencing shall be performed by the ERDF Operations Manager or his designee to ensure that the facility fence is intact and to determine the need to periodically remove debris that has accumulated. The physical security verification shall occur at least monthly and include verifying:

- The fence is intact,
- Normally used gates (Northwest Gate and North Gate from Figure 2.1) are operable and capable of being locked and locks are present/operable, and
- Normally locked gates (Two Southwest Gates and East Gate from Figure 2.1) and associated locks are operable and remain locked.

The Operations Manager will also perform periodic inspections for build-up of debris (particularly tumbleweeds) that could impact security and act as a "ramp" to allow debris to "roll-over" ERDF fences. Appropriate clearing shall take place to prevent these occurrences. These inspections should occur as part of the monthly security inspection and as necessary after significant wind/storm conditions that could have caused substantial debris build-up.

10.2 CERCLA Control Area and Access Control

The controlled area for CERCLA purposes is shown in Figure 2.1, ERDF Location and Basic Layout and will be controlled through posting, training, and access restrictions defined in the ERDF HASP. Surrounding areas are considered the CERCLA support zone and will be controlled only through the ERDF security fences (when locked) and postings. The northwest entry road will be posted for visitors to check in at the operations trailer, along with a similar sign outside the Operations Trailer clearly indicating visitor requirements. The controlled area will be enclosed by chain rope and stanchions with appropriate signs that complies with 40CFR requirements for control of CERCLA areas. Road access areas passing through the controlled area requiring normal use will be clearly posted with access requirements, but will not have gates. Road access areas not normally used will have portable stanchions, chain ropes and signs to indicate

access requirements. Specific ingress and egress procedures for these areas are described in the HASP and controlled through its implementation.

10.3 Control of Radioactive Material and Radiation Areas

Control of radioactive materials and radiation areas will be in accordance with BHI radiological controls procedures and ERDF specific requirements outlined in HASP. The contamination area (and any potential radiation areas) will be appropriately posted with stanchions, chain rope, and signs to indicate access requirements. The secondary access road out of the landfill cell in Figure 2.1 may or may not be posted as a controlled area depending upon the need for decontamination of trucks and equipment.

10.4 Control of Radiation Generating Devices

Radiation generating devices are not anticipated for normal use at ERDF during waste disposal operations, but must be adequately controlled should a need arise requiring their use onsite. The following requirements apply for introducing and controlling such a radiation generating device on the ERDF Site:

- Notification must be given to BHI radiological controls personnel at least seven working days prior to the need for bringing on the ERDF Site any radiation generating device or radioactive material not manifested for disposal at ERDF,
- The isotopes, activity, and physical nature of the device, along with its container and a quantified radiation dose must be understood to ensure that appropriate controls can be put in place for its use,
- The ES&H Manager must approve the need for the device onsite and work with BHI radiological controls personnel to determine an appropriate control scheme (including posting, storage, and use) prior to introduction to the site.

10.5 Bomb Threats

Personnel on the ERDF Site should use standard Hanford Site procedures for responding to bomb threats, including the use of bomb threat cards (Form BD-9100-201) to be placed near telephones. A person receiving a bomb threat should stay on the line and attempt to get answers to the following questions:

- When is the bomb going to explode?
- Where is it right now?
- What does it look like?
- What kind of bomb is it?
- What will cause it to explode?
- Did you place the bomb?
- Why?
- What is your address?
- What is your name?

The person receiving the call should also pay attention to the wording of the threat, caller's voice, background conditions and types of language used. After completion of the call, the person who received the call should notify the Project Manager and Hanford Patrol (911) so that appropriate actions can be taken, including potentially halting operations and evacuating the ERDF Site. The project manager, as emergency director, will implement the contingency plan, as appropriate and determine site actions in conjunction with Hanford Patrol recommendations.

10.6 Civil Disturbances

200 Area Disturbances - Notification of civil disturbances within the 200 Areas of the site will either come from the Hanford Patrol or BHI management. The WMFS Project Manager will determine, in conjunction with BHI management and the Hanford Patrol, whether to evacuate the site, cease operations, and/or lock the site with personnel inside for protective purposes.

ERDF Specific Disturbances - If a civil disturbance originates within the ERDF, personnel are not to take action towards the disturbing individuals and should move to protect themselves at all times through avoiding the disturbance. Waste disposal and transportation operations should be discontinued at the direction of the WMFS Project Manager and/or WMFS Operations Manager. The WMFS Project Manager and other key personnel are responsible for ensuring that the Hanford Patrol is notified of the disturbance so that appropriate action can be taken. The contingency plan of the HASP should be implemented, as necessary, for incidents that potentially spread contamination through releases to the environment or contamination of personnel and equipment.

11.0 Classified Information or Special Nuclear Material (SNM) Control

No classified information or SNM will be discussed, handled, or maintained at the ERDF Site.

12.0 Sensitive Unclassified Information

Unclassified controlled information will be appropriately identified, marked, and secured. Company private and personnel information will be identified, marked, and controlled in accordance with company policy.

13.0 Exceptions/Waivers

Exceptions or waivers to security requirements at the ERDF require the approval of the WMFS Project Manager or his designee.

Appendix A - ERDF Key Control Procedure

1.0 Purpose and Scope

1.1 Purpose

The purpose of this procedure is to establish the requirements for the ERDF key control program. The procedure provides specific guidance on procuring/issuing keys, accountability for keys, and surveillance of the facility.

1.2 Scope

This procedure applies to all ERDF facilities and personnel (WMFS, BHI, etc.) Desiring keys to access the facility during non-working hours.

2.0 Definitions

Individual System Key - A key that will only open a specific area (i.e., system) and not the entire ERDF operational facilities (i.e., radiological controls instrument storage).

Key Control Cabinet - The cabinet in the ERDF Operations Trailer is designated by the ERDF Project Manager for maintaining the facility inventory of security keys.

Key Control Log - The logbook to document the status of keys, including issuance, losses, theft, etc.

Key Custodian - The person designated by the ERDF Project Manager to implement the ERDF key control program.

Secured and Locked - A door or gate is secured and locked when a person cannot open the door or gate by pulling or working the latch or knob.

Unauthorized Use of Keys - The lending, borrowing, theft, or otherwise improper use of a security key by any person. Duplication or reproduction of security keys is strictly prohibited.

3.0 Responsibilities

3.1 ERDF Project Manager

The ERDF Project Manager is responsible for overall implementation of the ERDF key control program and security at the ERDF Site in general. Specific responsibilities include:

- Implementing this procedure,
- Ensuring that all ERDF personnel are knowledgeable of their responsibilities under this procedure,
- Designating a key custodian for day-to-day operation of the key control program,

- Issuing and maintaining a list of personnel and/or organizations (i.e., Hanford Patrol, Fire Department) authorized to be issued master keys,
- Approving the issuance of additional permanent keys, as necessary to allow access for non-WMFS key personnel, and
- Monitoring the performance of ERDF personnel against the requirements outlined in this procedure.

3.2 ERDF Key Coordinator

The key coordinator is responsible for overall day-to-day operation of the key control program, including:

- Establish, control, and maintain the ERDF key control program,
- Establish a locked ERDF key control cabinet and ensure that all security keys within their possession are stored to prevent loss, theft, or unauthorized use,
- Maintain a security key log to document keys currently issued and any incidents that are noteworthy,
- Perform a monthly key inventory, and
- Issue new keys as approved by the ERDF Project Manager.

3.3 WMFS Key Personnel

Key personnel (BHI ERC Team) will be issued master keys and will be responsible for overall site access control, including:

- When leaving the ERDF at the close of normal working hours, ensure that the last WMFS key person onsite locks and secures all trailers and the site security gate,
- Issue temporary keys to personnel who have legitimate business needs to continue to require access to the ERDF. Brief these personnel on which areas are not locked and require locking prior to leaving.

3.4 All Key Holders

- Key holders are equally responsible for the protection of government and WMFS Corporate property;
- Request security keys from the key custodian using a key request form,
- Report immediately to the on-call WMFS key person (or key custodian if during normal work hours) the following:
 - a) loss/theft of a key,
 - b) damage to a lock/key, or
 - c) damage to any access barrier that would allow unauthorized access to the facility.
- Return non-permanent security keys in their possession to the key custodian/on-call WMFS key person within one working day of completion of off-hour work activities.

4.0 Procedure

Positive control and accountability of keys for the ERDF site is essential to protect government/corporate equipment and the operability of the facility.

4.1 Property Protection Requirements

- a) All WMFS and government property shall be protected from theft, unauthorized removal, vandalism, and unauthorized or improper use by locking and securing the ERDF site from such activity,
- b) ERDF facilities shall be kept locked unless staffed by a BHI ERC Team key person for access (with the exception of personnel who are issued an off-shift temporary key by the WMFS on-call key person).

4.2 Key Control Requirements

- a) Security keys shall be logged in/out solely by the ERDF key custodian, project manager, or on-call WMFS key person,
- b) Security keys not in use shall be maintained in the ERDF key cabinet,
- c) Individuals who are assigned security keys shall ensure that they remain in their possession at all times, until returned to the key custodian,
- d) All security keys shall be hand delivered and should never be sent through the Hanford Plant or U.S. Mail,
- e) Non-BHI ERC Team key personnel must fill out a Key Request Form and receive proper approvals prior to presenting the form to the ERDF key coordinator for permanent key issuance,
- f) All documentation concerning the key control program will be maintained as required by the recordkeeping administrative procedure,
- g) Master keys shall be issued solely to the key personnel,
- h) Key/lock discrepancies shall be reported to the key coordinator.

4.3 Personnel Safety Requirements

No one shall be left inside the ERDF without possession of the necessary keys to allow them to exit.

4.4 Lock and Key Discrepancies

Upon notification of a discrepancy, the ERDF key coordinator will perform the following:

- a) Document the information surrounding the discrepancy and actions taken,
- b) Determine if a temporary alternate lock is required to correct the potential loss of facility control (i.e. a temporary lock on the ERDF site gate to prevent site access, and
- c) Notify the ERDF project manager when available to determine the need for rekeying and/or new locks to eliminate the temporary locking measures taken, upon the loss of key control.

ERDF Key Request/Authorization Form

I understand and agree to abide by the following ERDF key holder responsibilities:

- I am equally responsible for the protection of government and WMFS corporate property,
- I will only be issued a key upon properly filling out and having this form authorized,
- I must report immediately to the on-call WMFS key person (or key custodian if during normal work hours) the following:
 - a) loss/theft of a key,
 - b) damage to a lock/key, or
 - c) damage to any access barrier that would allow unauthorized access to the facility.
- I will return permanent security keys in my possession to the key custodian/on-call WMFS key person within one working day of completion of my assignment at ERDF.

I, the key holder, have read and understand these responsibilities.

Key Holder Signature

Date

Company Name

Organization

Job Title

Phone Number:

Reason for Access: _____

Authorization

Key Number: _____ Check-out Date: _____ Return Date: _____

Appendix B - ERDF Key Personnel Contact Information

Emergency Notification List for after hours security incidents/access needs:

On-Call ERDF Key Person Pager	(509) 543-0791
Jeff Biagini, ERDF Project Manager	Home Phone: (509) 946-7763
Garth Stowe, ERDF Field Superintendent	Home Phone: (509) 628-1708
Michael Madison, ES&H Manager	Home Phone: (509) 375-5214
Daniel Saucedo, Waste Acceptance Manager	Home Phone: (509) 543-8393

