

**USEC-100
Revision 1**

**JOINT POLICY STATEMENT ON
USEC AND DOE DIRECTIVES AND
MANAGEMENT EXPECTATIONS FOR
SHARED SITE ISSUES
AT PADUCAH GASEOUS DIFFUSION PLANT**

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1.0 PURPOSE

This joint USEC and DOE administrative policy statement addresses shared site issues at the Paducah Gaseous Diffusion Plant, in both leased and non-leased areas and facilities, as delineated in Reference A and B (see Section 3.0), and other shared site issues that have developed since Reference B was promulgated that require formal mechanisms for interface and control. This joint policy statement conveys joint management expectations and directives between DOE and USEC.

1.1 BACKGROUND

USEC leases certain portions of the Paducah and Portsmouth Gaseous Diffusion Plants (GDP) from DOE pursuant to a lease agreement. DOE was responsible for regulatory oversight of USEC operations until the NRC issued each GDP a Certificate of Compliance. On January 25, 1996, USEC and DOE issued a Resolution of Shared Site Issues at the Gaseous Diffusion Plants (SSIA) and USEC provided this document to the NRC in furtherance of the certification process at both GDPs. The purpose of the SSIA was to coordinate DOE and USEC activities at the GDPs.

On December 16, 1996, DOE and USEC issued a Joint Policy Statement for the Paducah Site that provided specific direction for implementing the SSIA and resolving other issues that were considered significant at PGDP. This is the first revision to the original Joint Policy Statement. The purpose of this revision is to update the original policy statement, including the addition of a new shared site issue titled "Access to Deleased Outside Areas" which was added to the SSIA in 1998 (Revision 1 to the SSIA dated March 28, 1998).

2.0 APPLICABILITY

This joint policy statement applies to all USEC and DOE personnel, and to personnel of their respective contractors and subcontractors. Some portions of the policy are also applicable to third party tenants of USEC, DOE and DOE contractors (see paragraph 6.5).

3.0 REFERENCES

- A. USEC and DOE Resolution of Shared Site Issues at the Gaseous Diffusion Plants, Revision 0, dated January 25, 1996
- B. USEC and DOE Resolution of Shared Site Issues at the Gaseous Diffusion Plants, Revision 2, dated February 20, 2009
- C. Application for United States NRC Certification – Paducah Gaseous Diffusion Plant Safety Analysis Report, revision 4 dated September 15, 1995
- D. Lease Agreement Between DOE and USEC for the GDPs, dated July 1, 1993

- E. Modification No 1 to Exhibit F of the Lease Agreement Between DOE and USEC (MOA for the Supply of Services) dated December 7, 2006
- F. Joint Procedure Between DOE and NRC, Response to Emergencies in the Leased Areas at the GDPs, signed January 18, 2001
- G. Lease Agreement Between DOE and USEC for the Gas Centrifuge Enrichment Plant, signed December 7, 2006
- H. DOE(ORO) letter dated September 10, 2007, subject: Notification to DOE(ORO) of events at the Paducah Gaseous Diffusion Plant Site (PGPD) and Portsmouth Gaseous Diffusion Plant Site (PORTS)
- I. DOE(PPPO) letter PPPO-02-445-08, dated May 27, 2008, subject: Notification to the Portsmouth/Paducah Project Office of the Events at the Paducah Gaseous Diffusion Plant Site

4.0 INTRODUCTION

This joint policy statement is co-sponsored by the USEC General Manager at PGDP, the DOE Assistant Manager for Nuclear Fuel Supply at ORO, and the DOE Manager for the Portsmouth Paducah Project Office in Lexington, KY as documented by the "concurred by" signatures at the end of the statement. For each issue identified in reference A, this joint policy statement defines the appropriate policy for interface and integration between USEC and DOE activities.

USEC and DOE have determined jointly that a need exists to formally establish a policy that coordinates, integrates, and communicates site activities. Where appropriate, procedures shall flow down from this policy statement. Both entities must ensure:

- USEC and DOE activities do not adversely affect the operations of the other party in terms of health and safety, environmental protection, safeguards and security, and nuclear regulatory compliance.
- Situations with the potential to affect both USEC and DOE operations and personnel, such as emergencies and threats directed toward site activities, are managed in a coordinated manner that protects the safety and health of DOE and USEC personnel, including their respective contractors, subcontractors, as well as the general public, and the environment.

4.1 DEFINITIONS

- A. PGDP Site Council. A body of senior managers chartered to provide oversight of the shared site process and resolve disputes between the site stakeholders. The principal and associate members of the PGDP Site Council and the protocols for Site Council meetings are described in Appendix A.

- B. Shared Site Point of Contact (SSPOC). A person assigned by each co-sponsor of this joint policy statement and each contractor of DOE (EM) to serve as the single point of contact for dealing with other co-sponsors or contractors in regard to issues of mutual concern. In the event the SSPOC is unavailable, the responsible organization will designate an alternative SSPOC.
- C. Shared Site Committee. An assembly of all SSPOCs. The Shared Site Committee meets regularly to discuss issues of mutual concern. The USEC SSPOC chairs this meeting following the protocols described in Appendix B. Meetings are held every two weeks at a minimum.
- D. Shared Site Activity Screening. A process or methodology described in Appendix C for identifying work activities that have potential to impact other organizations. This system ensures these work activities follow shared site policies established by this joint policy statement.
- E. Service User and Service Provider. The services in question are those specified in Reference E, MOA between DOE and USEC for the Supply of Services (Exhibit F to the Lease). The service user is the requesting party and service provider is the party providing what is requested.
- F. SSIA. SSIA stands for Shared Site Issues Agreement, which over the years has become the common name for Reference A as revised by Reference B ("USEC and DOE Resolution of Shared Site Issues"). The designation SSIA Section 1 then stands for resolution of the first issue in Reference A (Shared Systems and Continuity of Essential Services).
- G. Work Authorization. A written agreement between USEC and DOE or its contractors entered into to secure one or more services specified in Reference E (see Section 3.0). This agreement shall include specific details such as scope of work, cost estimates, schedule requirements applicable work rules and other appropriate requirements applicable to the service requested.
- H. Interface Control Agreement. An agreement between USEC and DOE or its contractors which designates the specific component in a shared system where responsibility for operation and maintenance is transferred from USEC to DOE or its contractors.

5.0 RESPONSIBILITIES

DOE and USEC shall ensure that their employees and the employees of their contractors, subcontractors and tenants are trained on this policy statement, that training records are maintained, and that training is updated to support later revisions to this joint policy statement.

The PGDP Site Council is responsible for revising this policy statement as issues emerge that are deemed significant and appropriate as shared site issues. Periodic reviews will be accomplished every 2 years by a subcommittee chartered by the PGDP Site Council to ensure that this joint policy statement is current.

This joint policy statement is neither a fiscal nor a funds obligation document. Nothing in this joint policy statement authorizes or is intended to obligate the parties to expend, exchange, or reimburse funds, services, or supplies, or transfer or receive anything of value, or enter into any contract assistance agreement, interagency agreement or other financial obligation.

This joint policy statement is intended to improve the coordination of work activities between USEC and DOE and its contractors at the PGDP. It is not intended to create any right or other benefit enforceable by a third party.

6.0 ACTIONS

Each of the following subsections address the resolution of a specific shared site issue. If the resolution came from Reference A or B (paragraphs 6.1 through 6.13), the exact wording used in Reference A or B will first be presented in a paragraph titled SSIA Agreement (see Definition F). Sections 6.14 through 6.17 address issues that were not resolved by Reference A or B (see Section 1.1, Background). These latter sections will start out with a statement describing the issue in a paragraph titled "Post SSIA Issue." Following both the "SSIA agreement" paragraphs and the "Post SSIA Issue" paragraphs, a PGDP policy statement will then be made in a separate paragraph. Some of these policy statements stand alone and others require implementation via appropriate procedures.

6.1 SHARED SYSTEMS AND CONTINUITY OF ESSENTIAL SERVICES (Section 1 of the SSIA)

6.1.1 SSIA Agreement

USEC provides certain services and utilities (e.g., lighting, heat) to DOE that are necessary for the safety, safeguards, or conduct of DOE activities. Similarly, USEC and DOE activities are protected or supported by shared systems (e.g., nuclear criticality and security alarm systems, fire protection sprinklers) that are important to the safety and safeguards of USEC and DOE activities.

USEC and DOE will work together to ensure that interruptions to services necessary for the safety, safeguards and security of the GDPs are minimized and that shared systems remain operable. Additionally, USEC will apply configuration management controls to these systems, in a manner commensurate with that applied to equivalent USEC systems, to ensure that the safety, safeguards and security systems, and conduct of USEC and DOE activities are not adversely affected. Similarly, USEC and DOE will work together to establish a process for controlling the scheduling of interruptions to essential services to ensure that the safety, safeguards, and security of the GDPs are not adversely affected.

6.1.2 PGDP Policy/Directives

USEC services and utilities to DOE and its contractors are provided in accordance with Reference E (see Section 3.0), Modification No 1 to Memorandum of Agreement for the Supply of Services in the Lease Agreement. Appendix B to this MOA provides a general description of each service provided by USEC. Written work authorizations establish the scope of work, cost estimates, schedule requirements, applicable work rules, and other appropriate requirements for each service (see Article III of MOA). Emergency Management Services and Security services discussed later in this joint policy statement (6.4.2 and 6.6.2 respectively) are both the subject of work authorizations.

Should any service user need to expand the scope of a work authorization, a request to modify the work authorization will be submitted to DOE who will enter into further negotiations with USEC to revise the applicable work authorization accordingly. DOE will advise its contractors when a change to a work authorization is made that impacts contractual obligations.

If the service to be provided by USEC is required by the safety basis of a facility being operated by a DOE contractor, DOE will ensure that provisions to perform periodic quality assessments are included in the work authorization applicable to the service (example: a training records audit). The scope of this activity will be clearly established in the work authorization.

6.1.2.1 Shared Systems Identification

USEC and the responsible DOE contractor shall define those systems that are "shared" (i.e., both organizations are serviced by the same system(s) since the system(s) are essentially plant wide covering both leased and non-leased areas). The Shared Site Committee will maintain a list of shared systems which will be updated as necessary at Shared Site Committee Meetings.

Each organization will ensure that procedures applicable to shared systems include operating restrictions that are needed to ensure continuity of operation for all system users and that provide confidence that the shared system will perform as designed. Changes to procedures applicable to shared systems that have the potential to impact others will be coordinated with all impacted parties as described in section 6.14 of this joint policy statement.

6.1.2.2 Interface

USEC shall ensure DOE and its contractors are aware of USEC's planned activities related to shared systems. Similarly, DOE contractors shall ensure that DOE and USEC are aware of their planned activities related to shared systems. The SSPOC for each organization is responsible for implementing this policy using the guidance for control of work activities established in 6.2.2 of this joint policy statement. All work that has the potential to degrade a shared system shall be the subject of a Shared Site Activity Screening Form described in Appendix C to this joint policy statement.

In cases where the operability of shared systems is vital to the operation of a facility, USEC and the responsible DOE contractor may enter into a more specific agreement (Interface Control Agreement) governing the required interfaces for such systems. If such an agreement is entered into, DOE (PPPO and ORO) will concur with any permanent boundary definitions and changes thereto. At a minimum, a temporary interface control agreement will be in place for Lockout/Tagout permitting activities that involve more than one organization (i.e. interface of shared systems). To facilitate cross boundary Lockout/Tagout permitting activities, organization specific procedures for Lockout/Tagout permitting will be subject to the requirements of Section 6.14 of this joint policy statement. Reviews conducted in accordance with this section will ensure that these procedures are mutually supportive with respect to working under a Lockout/Tagout permit that involves shared responsibility for energy isolation.

6.2 CONTROL OF WORK ACTIVITIES (Section 2 of the SSIA)

6.2.1 SSIA Agreement

DOE and USEC agree that activities in leased spaces must be conducted in accordance with USEC commitments to the NRC. Accordingly, DOE (including their contractors/subcontractors) will obtain USEC's approval prior to conducting work in leased spaces. Similarly, prior to conducting work in non-leased spaces, USEC (including their contractors/subcontractors) will obtain DOE's approval. Both parties will strive to ensure that such approvals do not impede the schedule for the work activities of either party. Additionally, both parties will ensure that work activities that affect either party are conducted in accordance with the appropriate procedures.

6.2.2 PGDP Policy/Directives

USEC and DOE, through its contractors, agree to establish procedures governing the control of work activities conducted on the government reservation. These procedures will be based on the same premises stated in References A and B which is repeated below.

1. The joint USEC and DOE approach to shared site issues does not modify, amend, or alter in any way the lease between USEC and DOE for the GDPs or any memoranda of agreement, or any other agreements between USEC and DOE.
2. The site can be divided into three types of areas: 1) DOE areas (generally non-leased) in which DOE managed or overseen activities which are exempt from NRC regulation under Section 110.a of the Atomic Energy Act of 1954, as amended, are conducted; 2) USEC leased areas in which USEC activities subject to NRC regulation are conducted; and 3) common areas (e.g., site roads) which are used for USEC and DOE activities.
3. DOE will self-regulate DOE activities conducted in DOE areas and common areas in accordance with applicable DOE requirements. This includes DOE personnel and their contractors/subcontractors. DOE assumes full responsibility for the safety, safeguards, and security of DOE activities.

4. USEC activities conducted in USEC areas and common areas are subject to NRC regulation under terms of the certificate application. This includes USEC personnel, their contractors, and subcontractors. USEC assumes full responsibility for the safety, safeguards, and security of USEC activities.

The USEC Privatization Act of April 26, 1996 mandates that USEC shall be subject to and comply with the Occupational Safety and Health Act (OSHA). Thus USEC activities are always conducted in accordance with both NRC and OSHA regulatory requirements. In common areas, which may be used by either USEC or DOE (see paragraphs 3 and 4 above), USEC must comply with NRC and OSHA regulatory requirements while DOE activities are conducted in accordance with DOE Rules, Orders and Standards.

6.2.2.1 Leased vs. Non-leased Facilities and Personality

Section 3.4 of Reference D (see Section 3.0) provides USEC the option to expand or reduce the leasehold subject to the requirements of section 3.5 of Reference D, one of which is to provide DOE with 60 days notice for review of the request. USEC and DOE hereby agree that notifications made pursuant to sections 3.4 and 3.5 of Reference D will be forwarded to the Lease Administrator in writing with a copy to PPPO, who will ensure that affected DOE contractors are aware of the impending change. After the Lease Administrator verifies that all requirements of section 3.5, and, if applicable, section 4.4 (Turnover Requirements) of Reference D are satisfied, the Lease Administrator will establish a transaction date and provide USEC (copy to PPPO) with written approval to revise Exhibit A to the Lease (Leased Premises) and/or Exhibit B to the Lease (Leased Personality). In this manner, the real time status of the leasehold becomes a matter of record.

A historic file of approved requests for lease changes will be established by the USEC SSPOC for reference by all SSPOC who attend Shared Site Committee meetings. This file may be either hardcopy or electronic.

6.2.2.2 Lease Map

To provide a periodic consolidation of leased facility changes made as described in the paragraphs above, building/facility status drawings (lease maps) are prepared as follows:

- When requested by the Lease Administrator, USEC will make necessary changes to the most recent building/facility drawing to reflect approved transactions and forward the updated drawing for approval signatures by the USEC Vice President for Operations and the Lease Administrator.
- The Lease Administrator will distribute approved copies to interested parties, including USEC and PPPO. Upon receipt of an approved copy, USEC will further distribute approved copies to all SSPOCs and enter an approved copy in USEC Document Control. Letter transactions (reflecting changes since the most recent lease map) provided to USEC by the Lease Administrator will also be provided to SSPOCs and entered into USEC Document Control.

6.2.2.3 Coordination of Work Activities

When a work activity is planned by any organization on site that has the potential to impact other organizations, the SSPOC for the organization performing the activity will make verbal notification to all SSPOCs at the next Shared Site Committee meeting or via telephone, followed by an e-mail confirming notification, if the activity will start before the next meeting. As described in Appendix C, the organization proposing to undertake the activity will ensure a Shared Site Activity Screening Form is completed prior to beginning the activity. The status of open screening forms will be discussed at Shared Site Committee meetings.

The following policies will govern work activities at PGDP:

1. Activities conducted by USEC within facilities or areas leased to USEC (including common areas), shall be conducted per USEC requirements and the applicable provisions of the lease and this joint policy statement (i.e. shared systems). If the activity has the potential to impact DOE or its contractors (example: work that produces fumes that might travel by wind to a facility operated by a DOE contractor), USEC will notify affected DOE contractor before starting the activity.
2. USEC shall obtain the responsible DOE contractor's approval using the Shared Site Activity Screening Form in accordance with Appendix C before conducting work within areas retained by DOE, unless the activity is in response to an emergency situation (security event, fire, radiological, etc.). In general, USEC workers will follow USEC procedures when performing work under work authorizations in areas retained by DOE. In some cases, however, the work will involve systems that are not covered by USEC procedures. In these cases the applicable procedure approved by the DOE contractor may be followed. Anytime USEC and DOE requirements differ the applicable work package will resolve these differences to the satisfaction of both parties.
3. Activities conducted by DOE and/or DOE contractors shall be conducted per the regulatory requirements of DOE rules as follows:
 - Activities conducted by DOE contractors in DOE retained facilities or areas shall be conducted per DOE requirements and the applicable provisions of this agreement (i.e. shared systems). If the activity has the potential to impact USEC or any other DOE contractor (example: demolition work that produces loud noises in close proximity to the facilities of others), the responsible DOE contractor will notify all affected parties before starting the activity.
 - The responsible DOE contractor will obtain USEC approval using the Shared Site Activity Screening Form in accordance with Appendix C before conducting DOE work in leased facilities or areas (including common areas). While DOE workers will follow DOE procedures, should DOE and USEC requirements differ; the applicable work package will resolve these differences to the satisfaction of both parties.

- The responsible DOE contractors will also obtain USEC approval using the Shared Site Activity Screening Form in accordance with Appendix C before conducting DOE work in DOE retained areas that are located in a leased facility such that access/egress corridors through the leased facility are required to move DOE material or equipment through these corridors. The first bullet above applies while working in the DOE retained area. The second bullet above applies while moving equipment through USEC leased space.
4. Notifications and Approvals discussed above shall be documented on the Shared Site Activity Screening Form before the work is started. The USEC SSPOC will advise the SSPOC for the requesting DOE contractor if Plant Operational Review Committee (PORC) approval and/or PSS notification is required prior to working in leased space.
 5. It is possible that USEC or DOE contractors (or their subcontractors) may plan work that impacts another entity without realizing that the potential for this impact exists. The shared site process established in this joint policy statement is designed to minimize the possibility of such an occurrence. SSPOCs from USEC and each DOE contractor are knowledgeable of their organization's work control process and use this resource to identify work in planning that has potential to impact others. These SSPOCs exchange information real time and periodically at Shared Site Committee meetings. Shared Site Activity Screening Forms are completed in accordance with Appendix C to this joint policy statement, and the protocol for Shared Site Committee meetings (Appendix B to this joint policy statement), ensures that issues of mutual interest are discussed and resolved in a timely manner.

6.3 PLANT CHANGES (Section 3 of the SSIA)

6.3.1 SSIA Agreement

DOE and USEC agree to establish procedural controls to ensure that each party is promptly notified, and appropriate approvals obtained, prior to conducting activities that affect the design, construction, operation or maintenance of facilities and systems on their respective portions of the GDP sites. This process will allow the other party to evaluate the potential safety impact of such a change on its own facilities, systems, and activities at the site.

USEC shall provide copies of revised or new safety analysis to DOE contractors when changes to the leased premises or operation of the leased premises have the potential to impact these contractors. Similarly, DOE contractors will provide copies of revised or new USQDs/Safety Analysis when changes to DOE retained facilities, systems, or operations have the potential to impact USEC. This will include any USQD evaluation that concludes a proposed change does involve an unreviewed safety question. In the event that either party has a concern about the potential impact of any plant changes by the other party on the safety of its own operations and activities at either GDP site, the appropriate USEC and DOE representatives for that site shall jointly review the change and take appropriate action to resolve the concern (including any required plant modifications) in a prompt manner.

6.3.2 PGDP Policy/Directives

USEC shall provide copies of revised or new safety analysis to DOE contractors as described in 6.3.1 when changes to the leased premises or operation of the leased premises have the potential to impact these contractors. Similarly, DOE contractors will provide copies of revised or new USQDs/Safety Analysis as described in 6.3.1 when changes to DOE retained facilities, systems, or operations have the potential to impact USEC. This will include any USQD evaluation that concludes a proposed change does involve an unreviewed safety question. The Shared Site Activity Screening Form described in Appendix C to this joint policy statement should be used to transmit this information.

The movement of any trailers and other semi-mobile facilities is considered a plant change that must be evaluated by USEC in accordance with USEC procedure CP2-EG-EG1075, Temporary and Portable Structure Control. Additionally, since building designators are used to dispatch USEC emergency response teams to an incident scene, it is imperative that trailers and other small facilities that are semi-mobile not be moved without formally advising the Plant Shift Superintendent (PSS). For these reasons should there be a need to move a trailer or other semi-mobile facility, the responsible facility manager shall submit a Shared Site Activity Screening Form for consideration by all potentially impacted SSPOCs.

6.4 EMERGENCY MANAGEMENT COORDINATION (Section 4 of the SSIA)

6.4.1 SSIA Agreement

In accordance with Exhibit F of the lease, USEC will provide emergency response training to DOE personnel, DOE contractors, and personnel of third party tenants of DOE at each of the GDPs. In accordance with the lease, DOE will reimburse USEC for the cost of this service. DOE will make the necessary arrangements to assure that these personnel attend such training and be responsible for tracking their participation to assure they receive the required initial and periodic training.

The Emergency Plan for both GDPs describes the roles and responsibilities of USEC and DOE in the event of an emergency. For a declared emergency, USEC has the lead in responding to the emergency and DOE serves as an onsite member of the Emergency Operations Center.

In the event of an emergency, in coordination with the USEC emergency management team, DOE will take the appropriate actions to control activities in the reservation area surrounding each of the GDP sites, as defined in the current Emergency Plan for each GDP. This includes the exclusion or evacuation of personnel from each area during an emergency. Additionally, USEC has ample authority to restrict access to the controlled area of the GDP for the purposes of plant protection, security, emergency preparedness, and radiation protection.

6.4.2 PGDP Policy/Directives

USEC and DOE, through its contractors, shall issue/revise the appropriate policies, directives, and procedures to address the agreements stated in the first paragraph under 6.4.1. Changes to these policies, directives and procedures that impact another organization will be coordinated with affected parties as described in section 6.14 of this joint policy statement.

To ensure the most effective application of DOE personnel and resources during an emergency, DOE contractors will enter into a Memorandum of Understanding (MOU) to establish a coordinated plan for manning DOE positions in the EOC and assisting USEC in responding to various emergencies. This guidance recognizes the need to tailor the DOE response based on the location and character of the emergency.

In accordance with Reference F (see Section 3.0), when the EOC is activated and an emergency condition is declared, the NRC will become the Lead Federal Agency (LFA) for the emergency until the nature of the event warrants that DOE or another organization becomes the LFA. This includes emergencies that are related to security threats.

A work authorization between USEC and DOE provides the mechanism for USEC to take the lead role in Emergency Management at PGDP. Among other things, this work authorization provides for fire fighting services, emergency medical response, hazardous material control, emergency communications through the Plant Shift Superintendent (PSS), and training for DOE personnel assigned to the EOC. Emergency Familiarization training for employees of DOE and DOE contractors is not included in this work authorization. Rather, DOE prime contractors provide this training in conjunction with organization specific GET training programs. USEC will ensure that the core GET curriculum discussed in paragraph 6.16 of this joint policy statement includes all Emergency Familiarization Training required by Reference C (see section 3.0).

If the Emergency Management service being provided by USEC is required by the safety basis of a facility being operated by a DOE contractor, DOE will ensure that provisions to perform periodic quality assessments are included in the work authorization applicable to the service (example: a training records audit). The scope of this activity will be clearly established by the work authorization.

6.5 THIRD PARTY ACTIVITIES ON GDP SITES (Section 5 of the SSIA)

6.5.1 SSIA Agreement

DOE and USEC agree to promptly provide each other with pertinent information concerning any operations or activities being conducted on their respective portions of each of the GDP sites, and the surrounding DOE-owned reservation on which that site is located, by or on behalf of third parties (e.g., the National Guard and other DOE tenants or lessees) that could have a potential impact on the operations or activities of the other parties at that site. Specifically, DOE will provide USEC (and vice versa) with a written description of each existing third party lease

agreement for each GDP site, including a detailed description of (a) any hazardous materials used or stored on site in connection with such lease, (b) any operations or activities being conducted under such lease that could pose a hazard to USEC's operations on the leased premises or act as an initiating event for an accident on the leased premises, and (c) any transportation or other access requirements on the leased premises or common areas of the site associated with such lease, particularly with respect to the transportation or storage of hazardous materials or equipment. Such descriptions shall be updated promptly to reflect changes in third party activities. In the event that either party has a concern about the potential impact that third party activities could have on the safe operation of either GDP site, the appropriate USEC and DOE representatives for that site shall jointly review the issue and take appropriate action to resolve the concern in a prompt and cost-effective manner.

6.5.2 PGDP Policy/Directives

Both USEC and DOE, through its contractors, shall issue/revise the appropriate procedures to address the agreement addressed in 6.5.1 above.

6.6 PHYSICAL PROTECTION COORDINATION (Section 6 of the SSIA)

6.6.1 SSIA Agreement

Effective access control and response to threats against site activities and facilities requires integrated access control for USEC and DOE activities and coordinated command and control in responding to threats against site facilities and activities. USEC will continue to maintain a physical security protection plan for the GDPs which defines the roles and responsibilities of the site security organizations. In the event of a security threat at the GDPs (including both leased and non-leased areas), USEC's security force has the responsibility to initially respond to the threat and determine the appropriate course of action. Depending on the significance of the security threat, the Emergency Operations Center at the affected site will be activated and, as discussed in Item 4 of this enclosure, USEC and DOE will respond accordingly.

6.6.2 Policy/Directives

A work authorization between USEC and DOE provides the mechanism for USEC to implement the provisions of section 6 of the SSIA Agreement. Among other things, this work authorization provides for access control, roving patrols and armed response by security personnel qualified to DOE requirements. This work authorization does not provide for training necessary to maintain a DOE clearance nor does the core GET curriculum discussed in paragraph 6.16 provide for this training. This training is the responsibility of the organization sponsoring the DOE clearance.

If the Security service being provided by USEC is required by the safety basis of a facility being operated by a DOE contractor, DOE will ensure that provisions to perform periodic quality assessments are included in the work authorization applicable to the service (example: a training records audit). The scope of this activity will be clearly established in the work authorization.

6.7 EVENT NOTIFICATION (Section 7 of the SSIA)

6.7.1 SSIA Agreement

USEC will promptly notify DOE of any reportable events required by 10 CFR 76 or other applicable NRC regulations. This notification will normally be made by the Plant Shift Superintendent's (PSS) office. However, this notification will not take precedence over the prompt notification of the NRC as required by NRC regulations. Similarly DOE will promptly inform USEC of any reportable events, under DOE's occurrence reporting system, for which DOE is responsible. Such notification will normally be made to the PSS's office.

6.7.2 PGDP Policy/Directives

Both USEC and DOE, through its contractors, shall issue/revise the appropriate procedures to address the agreement addressed in paragraph 6.7.1 above.

In addition to any reportable events required by 10 CFR 76 or other applicable NRC regulations, USEC has agreed to provide notifications to ORO and PPPO as requested in References H and I respectively (see Section 3.0).

6.8 HELIPAD (Section 8 of the SSIA)

6.8.1 SSIA Agreement

USEC will establish written controls for helicopter access to the GDP sites, and the air space over the sites for use by USEC, DOE, or other DOE tenant organizations at the sites and to assist state or local law enforcement or emergency response personnel. Once established, DOE agrees to abide by these controls. As part of these controls, DOE will obtain USEC's concurrence from the PSS prior to utilizing the site helipad.

6.8.2 PGDP Policy/Directives

The helipad at PGDP does not exist. Therefore no actions are required for this issue

6.9 COMMUNICATION OF INCIDENT INFORMATION AND MEDIA COORDINATION (Section 9 of the SSIA)

6.9.1 SSIA Agreement

DOE and USEC will coordinate information releases to the media in the following manner;

- a. DOE has the lead role in providing information relating to DOE activities and USEC will refer the media to DOE in such cases; and

- b. USEC has the lead role in providing information relating to USEC activities and DOE will refer the media to USEC in such cases unless there is a need for DOE to provide information in its role as site landlord.
- c. DOE and USEC will promptly provide each other with information copies of news releases of events that occur at the GDPs.

6.9.2 PGDP Policy/Directives

USEC and DOE or its contractors shall issue/revise the appropriate procedures to address the agreement addressed in paragraph 6.9.1 above.

6.10 RADIATION PROTECTION (Section 10 of the SSIA)

6.10.1 SSIA Agreement

Radiation Protection (e.g., exposure monitoring) of employees is the responsibility of the employer (USEC or DOE) and is independent of the activities upon which they are working. That is, radiation protection for DOE personnel and their contractors/subcontractors is performed under the DOE radiation protection program. Similarly, radiation protection for USEC personnel and their contractors/subcontractors is performed under the USEC radiation program. In addition:

- a. Radiation exposure information for individuals who work on both DOE and USEC activities will be shared to permit DOE and USEC to satisfy their radiation exposure reporting requirements; and
- b. DOE will provide NRC with the radiation exposure information for DOE employees and their contractors/subcontractors, as requested, in order to meet NRC's reporting requirements.

In accordance with Exhibit F of the lease, USEC will provide radiation protection training to DOE personnel, DOE contractors, and personnel of third party tenants of DOE at each of the GDPs. In accordance with the lease, DOE will reimburse USEC for the cost of this service. DOE will make the necessary arrangements to assure that these personnel attend such training and be responsible for tracking their participation to assure they receive the required initial and periodic training.

6.10.2 PGDP Policy/Directives

USEC has implemented a radiation protection program consistent with NRC requirements which includes Radworker training for USEC employees, contractors, subcontractors and visitors. This training program covers any differences in posting, classification, etc., that exist between DOE and USEC programs as appropriate to the level of training. USEC will notify DOE of any planned changes to the USEC radiation protection program, in sufficient time for DOE and its contractors to determine if their Radworker training module needs to be revised to reflect the change.

DOE contractors have or will implement radiation protection programs based on DOE requirements which include Radworker training of DOE employees, contractors, subcontractors and third party tenants. This training will cover any differences in posting, classification, etc., that exist between DOE/USEC programs as appropriate to the level of training. DOE and DOE contractors will notify USEC of any planned changes to their radiation protection program in sufficient time for USEC to determine if USEC Radworker training module needs to be revised to reflect the change.

Should USEC employees, DOE personnel, or employees of DOE contractors discover an area or activity (whether temporary or permanent) that should be posted and is not, that person will immediately notify the PSS who will make the appropriate notifications.

6.11 INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA) SAFEGUARDS AGREEMENT IMPLEMENTATION (Section 11 of the SSIA)

6.11.1 SSIA Agreement

DOE and USEC will cooperate with the NRC in development, review, and revision of Subsidiary Arrangements and Facility Attachments for DOE and USEC activities at the site which are applicable to the safeguards requirements of the IAEA.

6.11.2 PGDP Policy/Directives

Subsequent to signing the SSIA on January 25, 1996, it was determined that PGDP would not be subjected to IAEA inspection, thus no follow-up was ever done on this section of the SSIA.

6.12 UNCLASSIFIED CONTROLLED NUCLEAR INFORMATION (UCNI) (Section 12 of the SSIA)

6.12.1 SSIA Agreement

DOE is developing guidelines with consultation and technical support from USEC for the identification of UCNI at the GDPs and will provide these guidelines to NRC.

6.12.2 PGDP Policy/Directives

DOE provided USEC and the NRC with TG-PGD-1, Unclassified Controlled Nuclear Information Topical Guidelines for Enrichment by Gaseous Diffusion in August 1996, thus no further action is required for this SSIA agreement.

6.13 ACCESS TO DECLASSIFIED OUTSIDE AREAS (Section 13 of SSIA)

6.13.1 SSIA Agreement

All activities in non-leased areas will be executed consistent with DOE requirements. USEC procedures which comply with NRC requirements may be utilized provided they meet or exceed equivalent DOE requirements. Subject to DOE approval, USEC may be permitted to run additional or new utilities over and/or under these outside areas to serve additional needs of USEC and DOE. USEC will contact DOE prior to work in these areas and will not violate any requirements imposed on DOE by other regulatory agencies (e.g., EPA, OSHA). In cases where prior notification would deter USEC's ability to respond to an exigent situation (e.g., emergency response situations, water main breaks, etc.), notification will occur as soon as practical.

6.13.2 PGDP Policy/Directive

The policies addressed in paragraph 6.2.2 of this joint policy statement adequately cover the agreement documented in 6.13.1 above.

6.14 PROCEDURE ISSUANCE

6.14.1 Post SSIA Issue

Procedures are being issued or revised by site organizations without a coordinated review for concurrence by other site organizations which are/were impacted by the procedure's new contents.

6.14.2 PGDP Policy/Directives

Procedures being issued or significantly revised by either USEC or DOE, through its contractors, shall be coordinated with affected site organizations for review and concurrence (before issue). For the purpose of this policy, a significant change is one that could potentially require action on the part of the reviewer. The time allotted by the issuing organization for review shall be adequate and with advance notification. In cases requiring extremely short processing time, the issuing organization will make notification to the other party of the need for expeditious review. Disagreements over review due dates will be addressed per section 7.0 of this joint policy statement. Typical types of procedures that might affect more than one party include:

- Plans and procedures related to emergency management and event notifications
- Plans and procedures that affect security
- Procedures related to operation and maintenance of shared systems
- Procedures that directly affect the safety basis of another organization
- Procedures that affect control of work
- Shared site procedures

The procedure control process in effect at each site organization will ensure that affected party reviews conducted prerequisite to procedure issue/revision include a determination that the change does or does not potentially require action on the part of another party. If the determination is that it does require action, the affected organization will be provided a copy of the draft for review and comment. If the procedure contains proprietary information, a confidentiality agreement will be executed prior to cross-site reviews.

6.15 PERSONNEL ACCOUNTABILITY

6.15.1 Post SSIA Issue

The site must ensure all site personnel are accounted for on a daily basis and, especially, in the event an emergency is declared.

6.15.2 PGDP Policy/Directives

USEC and DOE shall ensure accountability for their respective employees, subcontractors, and visitors on a daily basis. No further documents are needed to implement this policy.

6.16 GENERAL EMPLOYEE TRAINING (GET)

6.16.1 Post SSIA Issue

There are several organization specific GET programs on site and recent events suggest a need to better coordinate these programs to ensure that policies that should be common are in fact common. In addition to emergency response familiarization training discussed in paragraph 6.6.2 of this joint policy statement, the GET program needs to cover common rules for access control, traffic safety, observing postings, use of common areas, and a variety of other subjects that have shared site implications. This body of knowledge should constitute the core of every GET program.

6.16.2 PGDP Policy/Directives

Each organization will identify information that should be included in core GET because of regulatory requirements, the need for hazard recognition in the area they control, the potential for mutual interference in common areas, and shared responsibilities discussed elsewhere in this joint policy statement. This information will be provided to a standing GET subcommittee of the PGDP Site Council whose membership includes a Training representative from USEC and each

DOE prime contractor. The subcommittee will consolidate this information and develop a curriculum for core GET.

The core GET curriculum will be agreed to by all parties and made part of the USEC and DOE versions of GET. The core GET curriculum will also include those elements essential to meet the USEC requirements as provided in the PGDP Visitor's Site Access Orientation Handbook. Changes to the core GET curriculum will not be made without review and concurrence of the standing subcommittee discussed above.

6.17 SAFETY OF EMPLOYEES USING THE COMMON AREAS

6.17.1 Post SSIA Issue

In general the common areas of PGDP consist of roads and buffer zones around facilities. These areas serve as ingress and egress routes to non-leased facilities and areas controlled by DOE contractors. Work in these areas is controlled as described in paragraph 6.2.2 of this joint policy statement, and rules that apply to people transiting through these areas are covered in core GET discussed in paragraph 6.16.2 of this joint policy statement. However, with work forces from multiple organizations sharing the common areas, there is potential for the activity of one organization to pose risks to workers from another organization. Thus, all organizations need to work together to identify and mitigate these risks.

6.17.2 PGDP Policy/Directives

USEC and DOE contractors each have established processes for conducting hazard analysis of their various activities. When these activities take place in a common area and boundaries cannot be established to separate the work zone from personnel transiting through the common area, USEC and DOE contractors will share the results of hazard analysis performed for the activity pursuant to their respective process for hazard analysis. At a minimum each organization will conduct a hazard analysis for different classifications of Powered Industrial Trucks used in common areas to perform work activities. Concerns over any aspect of another organization's hazard analysis will be documented via the applicable corrective action program and resolved via the shared site process.

A subcommittee of the PGDP Site Council will be formed to implement the policy above. The membership of this subcommittee will include a representative from the Safety organization of USEC and each DOE contractor, in addition to the SSPOC for both DOE(PPPO) and DOE(ORO). Members of the subcommittee will also share reports of safety deficiencies identified in their respective corrective action programs (example: traffic sign damaged), and make follow-up reports when these deficiencies are corrected. The Subcommittee will meet as needed to discuss identified safety concerns and determine necessary corrective actions. Appendix D will be used to document the safety concerns in common areas and resolution thereof. These forms will be reviewed at the next Shared Site Committee meeting and copies distributed to all Principal Site Council Members.

7.0 DISPUTE RESOLUTION

Resolution of concerns, disagreements, or conflicts between USEC and DOE or between their contractors/subcontractors will be resolved through the normal working process. If resolution cannot be reached, the appropriate level of management for each party shall meet jointly with the respective parties to effect resolution. In those rare cases where resolution still is not affected, the concerned employees and their management shall bring the issue to the attention of the Site Council.

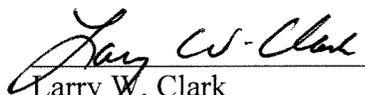
Issues involving work coordination will be resolved by mutual agreement of the USEC General Manager and the DOE (EM) PPPO Manager. Issues involving the Lease will be resolved by mutual agreement of the USEC General Manager and the DOE (NE) ORO Assistant Manager for Nuclear Fuels Supply.

8.0 UNRESOLVED ADMINISTRATIVE CONTROL ISSUES

There were no unresolved administrative control issues at the time Revision 1 to this joint policy statement was signed by the co-sponsors.

CONCURRED BY:

 3/4/09
Steven R. Penrod Date
General Manager
Paducah Gaseous Diffusion Plant
United States Enrichment Corporation

 3/6/09
Larry W. Clark Date
Assistant Manager for Nuclear Fuel Supply
U. S. Department of Energy

 3/25/09
William E. Murphie Date
Manager
Portsmouth/Paducah Project Office
U. S. Department of Energy

Appendix A Protocol for PGDP Site Council

1. Principal Members
 - a. USEC General Manager
 - b. DOE (NE) Assistant Manager for Nuclear Fuel Supply
 - c. DOE Manager PPPO
2. Each Principal assigns a designee to act when they are not available to attend meetings
3. Contractors as designated by DOE are associate members of the Council and will participate in meetings as directed by DOE. Associate members represent the interests of their respective organizations to DOE Manager PPPO (or designee) who participates in dispute resolution as described in paragraph 7.0 of the joint policy statement.
4. Meetings held quarterly or at request of any Principal Member
5. To conduct business, a quorum will be defined as at least one of the Principal Members and a designee from each of the other Principals.
6. Principal Members assign a council secretary (rotational position)
7. Purpose of PGDP Site Council
 - a. Resolve disputes as described in paragraph 7.0 of the joint policy statement
 - b. When additional policies are deemed appropriate, revise USEC-100 per paragraph 5.0 of the joint policy statement
 - c. Provide oversight of shared site process using the information provided in the standard agenda below
 - d. When unsatisfactory implementation of the shared site process is detected, issue joint statements of resolution to highlight the need for improvement
8. Standard meeting agenda items
 - a. Approve minutes from last meeting
 - b. Review highlights of minutes from Shared Site Committee meetings
 - c. Identify topics for consideration at Shared Site Committee meeting
 - d. Identify any key events scheduled before next meeting

Appendix B Protocol for Shared Site Committee Meeting

1. Meeting attendees
 - a. Shared Site Points of Contact (SSPOC) for DOE and DOE contractors
 - b. Shared Site Point of Contact (SSPOC) for USEC
 - c. Other subject matter experts for topics on the agenda

2. SSPOC for USEC will coordinate meeting
 - a. Advise attendees of meeting time/location
 - b. Publish agenda for meeting
 - c. Chair the meeting
 - d. Publish minutes
 - e. Track action items

3. Meetings will be held every two weeks at a minimum

4. Purpose of meeting is to implement the shared site process
 - a. Identify activities that have potential to impact others
 - b. Ensure all identified activities are screened per Appendix C
 - c. Track actions necessary to prevent mutual interference
 - d. Resolve disputes at lowest level
 - e. Promote a safe working environment at PGDP

5. Standard meeting agenda
 - a. Review of open action items from minutes of previous meetings
 - b. Update from each SSPOC on all activities scheduled during the next 6 months that remotely may involve another organization
 - c. Recap discussion of items/issues identified since last meeting including those documented on active Shared Site Activity Screening Forms
 - d. Safety issues, safety observations, and lessons learned from each organization since last meeting as documented in corrective action programs or Operational Evaluation Reporting Program (OERP)
 - e. DOE/PPPO issues raised by Shared Site Council

Appendix C
SHARED SITE ACTIVITY SCREENING FORM
Page 1 of 2

A Shared Site Activity Screening (SSAS) Form shall be completed for each work activity of USEC, DOE contractors, or their subcontractors and/or third party tenants that has the potential to impact other organizations. The determination of which work activities have the potential to impact other organizations will be made by an appropriate level of management assigned this responsibility in the organizations shared site procedure.

Use of the screening form is **mandatory** for any proposed activity that satisfies one or more of the following shared site applicability criteria:

- interfaces with or pass through a DOE/USEC/Third Party Tenant boundary
- impacts access to or planned activities within a DMSA located in leased space
- impacts a shared system
- requires a decision as to regulatory oversight authority (e.g., NRC or DOE).

The preparer/requester shall be the individual within the respective organization that is planning the work activity. If a DOE contractor is contracting USEC to perform an activity or service requested by DOE, the responsible contractor should complete this form.

The preparer shall complete information for Blocks #1 through #4 on the form and check the appropriate boxes for Blocks #5 through #12. Based on box checked for Block #12, answer the questions in either Block #13 (work to be performed by USEC), step #14 (work to be performed by a Third Party Tenant), or Block #15 (work to be performed by a DOE contractor). The preparer then completes Block #16 to determine whether special reviews will be needed. The preparer signs and dates the form at Block #17.

The preparer then requests the appropriate level of management within the preparer's organization to review the form, make any necessary changes, and to sign and date it at Block #18. Each organization will define the appropriate level of management for signing block #18 in their shared site procedure.

If the SSAS form is being submitted as notification only, check the box for "Notification Only" in Block #19 and identify the party to be notified. The form may then be placed in a work package for submittal to the other party shortly before the activity is scheduled to begin. If special requirements (Block #16) indicate that a special review is needed (other than the USQD review that all work packages receive), then send it to the affected party in advance and keep a copy for the work package until it is returned with the approval signature in Block #19.

This form is intended to facilitate communication and concurrence, when needed, under the umbrella of the Shared Site concept. It is not intended nor is it designed to replace other evaluations/analyses and procedures that are normal to the site's procedural flow of work. Once completed, this form shall be part of the documentation package assembled for the work activity and shall be filed accordingly.

The one-page form on the next page has no headers and may be copied directly and used.

SHARED SITE ACTIVITY SCREENING FORM

1. Work Package ID (if any)		SSAS Log No _____	
2. Location of Work:		3. System ID:	
4. Brief Description of Work:			
5. Is this work area leased or non-leased?	<input type="checkbox"/> Leased	<input type="checkbox"/> Non-leased	
6. The system is:	<input type="checkbox"/> USEC's	<input type="checkbox"/> DOE's	<input type="checkbox"/> Shared
7. Are hazardous materials/equipment used, stored, and/or transported?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
8. Could activity pose hazards to site facilities or personnel?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
9. Could activity act as initiating event for an accident?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
10. Have emergency response plans been defined (if needed)?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
11. Have compensatory measures been defined (if needed)?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
12. The work is owned by:	<input type="checkbox"/> USEC (Go to Step 13)	<input type="checkbox"/> PRS/DOE (Go to Step 15)	
	<input type="checkbox"/> THIRD PARTY TENANT (Go to Step 14)		
13. USEC WORK			
A. Does work affect a non-leased facility, a shared system, or common area?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
B. Is work to be performed in a SWMU?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If yes, SWMU # _____, PRS contact: _____			
Attach work package for EPA notification or other regulatory notification.			
C. Is work to be performed in, above, or adjacent to a DMSA?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If so, what classification?			
	<input type="checkbox"/> Phase 1	<input type="checkbox"/> Phase 2	<input type="checkbox"/> Phase 3
D. Is Safety Evaluation required?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If yes, attach copy of USEC SA/USQD/USQ.			
E. Who will perform regulatory oversight?	<input type="checkbox"/> NRC	<input type="checkbox"/> DOE	
F. Go to step 16.			
14. THIRD PARTY TENANT WORK			
A. Does work affect a non-leased facility, a shared system, or common area?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
B. Is work to be performed in a SWMU?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If "yes," SWMU # _____, PRS contact: _____			
Attach work package for EPA notification or other regulatory notification.			
C. Is work to be performed in, above, or adjacent to a DMSA?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If so, what classification?			
	<input type="checkbox"/> Phase 1	<input type="checkbox"/> Phase 2	<input type="checkbox"/> Phase 3
D. Is Safety Evaluation required?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If "yes," attach copy of safety evaluation or review.			
E. Who will perform regulatory oversight?	<input type="checkbox"/> NRC	<input type="checkbox"/> DOE	
F. Go to step 16.			
15. DOE WORK			
A. Is work area located in a leased facility?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If work area is a DOE-retained area within a leased facility, have access/egress routes been previously defined/agreed to?			
	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
B. Is work to be performed in, above, or adjacent to a DMSA? Specify _____	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If so, what classification?			
	<input type="checkbox"/> Phase 1	<input type="checkbox"/> Phase 2	<input type="checkbox"/> Phase 3
C. Does work affect a leased facility, a shared system, or a common area?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
D. Is work to be performed in a SWMU?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If yes, SWMU # _____, PRS Contact: _____			
Has EPA or other regulatory notification been made?			
	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
E. Is Safety Evaluation (e.g., UCD/USQD) required?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
If yes, attach copy of reference document(s) # _____			
F. Who will perform regulatory oversight?	<input type="checkbox"/> NRC	<input type="checkbox"/> DOE	
G. Go to Step 16.			
16. SPECIAL REQUIREMENTS (Check Any That Apply)			
<input type="checkbox"/>	DOE CT ES&H Review	<input type="checkbox"/>	USEC ES&H Review
<input type="checkbox"/>	DOE CT Nuclear Safety Review	<input type="checkbox"/>	USEC Facility Safety Review
<input type="checkbox"/>	DOE CT IRC Review	<input type="checkbox"/>	USEC PORC Review
<input type="checkbox"/>	None Expected	<input type="checkbox"/>	Other: _____
17. Preparer/Requester:		Date:	
18. Reviewing Manager:		Date:	
19. If Received for Approval, Signature		Notification Only (Signature Not Needed)	
Name of Person Notified:		Date:	

Appendix D
Common Area Safety Concern

1. Concern Number _____ (provided by USEC Health & Safety)

2. Date _____

3. Reporting Organization/Contact _____

4. Safety Concern

5. Reference Standard _____

6. Date Safety Subcommittee Meeting Held _____

7. Members Present

8. Corrective Action

9. Date Reviewed with Shared Site Committee _____

10. Date Copies Forwarded to Principal Members of Site Council _____

Completed forms will be retained by USEC Records Management