

TRANSITION PLAN
PHASE II DECOMMISSIONING
MALLINCKRODT C-T PLANT
ST. LOUIS, MISSOURI

Project No. 137131

Revision 0

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Executive Summary

The primary objective of this Transition Plan (TP) for the Covidien-Mallinckrodt St. Louis Facility (the site) is to identify the actions required to transition the responsibility to complete the Phase II Decommissioning Project from the current contractor (AECOM) to EnergySolutions, LLC (EnergySolutions). This TP documents the necessary activities to successfully transfer operational responsibilities from the present Contractor to EnergySolutions. Appropriate planning will allow this transition to be accomplished in a seamless manner with minimal impact to Mallinckrodt's on-going operations and regulatory commitments. Project activities remaining include; site remediation and decommissioning, shipment and disposal of radioactive waste, site restoration and demobilization, and final status survey, close-out reports and license closure. This transition will be accomplished without compromising the health and safety of workers, the environment, or the public. In addition, it will not result in a change to the Mallinckrodt C-T Phase II D&D Plan or a need for a license amendment.

This plan documents the organization, labor and non-labor resources, responsibilities, technical requirements, interfaces, and deliverables in order to begin where the prior contractor had yet completed.

The period covered by this plan will commence immediately upon notice of contract award (General Services Agreement between Mallinckrodt and EnergySolutions). The transition period will be completed within 14 calendar days of contract award. During the transition period, EnergySolutions will:

- Transition the necessary workforce (to the extent the affected personnel are prepared to transition) from the present Contractor to EnergySolutions. This may include novating the existing contracts and leases deemed critical to the project;
- Establish an efficient, flexible organization capable of completing the remaining scope of work to include mobilizing the necessary personnel, equipment, and facilities;
- EnergySolutions will review and revise, as necessary, the project work plans and related documents to include the health and safety plan—EnergySolutions will adhere to the requirements in the NRC-approved Mallinckrodt C-T Phase II Decommissioning Plan. Changes/edits will be summarized in a revision table which will be included at the front of each plan. Additional reviews will include, existing survey data and packages generated to date;
- Instill our Corporate values into management and employees;
 - **Safety First** - We always put safety first.
 - **Trust** - We build trust by:
 - Always telling the truth,
 - Making our customer's success our success,
 - Being the best in the world at what we do, and
 - Delivering results.
 - **Employees**- We care deeply about our employees and want them to be happy and successful.

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1.0 Introduction

This document specifies the activities required to transition the Mallinckrodt C-T Phase II Decommissioning Project in St. Louis, Missouri from the former contractor (AECOM) to *EnergySolutions*. The remaining project activities include; site remediation and decommissioning, shipment and disposal of radioactive waste, final status surveys, site restoration and demobilization, and the final status survey and project close-out reports and license closure.

This plan allows sufficient time to effectively evaluate existing documentation and processes and identify issues that could affect a seamless transition. Activities performed during the transition period are shown on the TP schedule (Attachment 1).

1.1 Objective

The objective for the transition period is to provide a safe, timely, compliant, seamless, and efficient transition while ensuring minimal impacts to Mallinckrodt's on-going operations and regulatory commitments.

EnergySolutions' will apply our corporate values during this period to provide assurance to Mallinckrodt that the transfer of operational responsibility from the former contractor to *EnergySolutions* is accomplished in a timely and efficient manner.

1.2 Approach

EnergySolutions approach to accomplish this transition is to establish an organization which includes some of the former subcontractor workforce who possesses critical process and operational knowledge. A project team, as outlined in Figure 1, has been assembled that possesses the necessary expertise and experience to effectively execute the remainder of this project.

EnergySolutions will review, revise, and implement the required project plans necessary to accomplish the assigned scope of work. We understand this project has established the necessary documents to execute the decommissioning plan; therefore, we do not anticipate any significant changes. Communications with the various Mallinckrodt organizations and Plant Managers involved in the review, approval, and oversight processes will be established during a kick-off meeting scheduled for the first week *EnergySolutions* is on-site.

EnergySolutions will rapidly mobilize the necessary personnel, equipment and facilities required to execute this project.

2.0 Organization

During the transition period, EnergySolutions will apply its full-breadth of company resources to ensure a smooth and seamless transition. The organization will include:

The **Project Director** will provide single-point accountability to Mallinckrodt. The Project Director will be responsible for:

- Ensuring the transition phase is executed safely, compliantly, and efficiently;
- Demonstrating “readiness” to receive the transfer of operational responsibility; and
- Identifying and assembling the project organization.

The **Project Manager** will focus on implementation, safety, and compliance. The Project Manager is responsible for the overall project and the team and is responsible for:

- Ensuring the required project plans are reviewed, developed (if necessary), approved, and ready for implementation.
- Performing a self-assessment to demonstrate “readiness” to receive the transfer of operational responsibility.
- Ensuring the integration of some of the existing Contractor’s workforce (including sub-contractors and vendors).
- Developing/updating the project schedule to support the remaining project activities and deliverables.

The **Project Health Physicist (PHP)/Radiation Safety Officer (RSO)** will focus on the execution of the Decommissioning Plan, Radiation Safety, and the Final Status Surveys (FSS) and Report (FSSR). The PHP/RSO guides the remediation, sampling, and data analysis efforts to ensure successful execution of the Decommissioning Plan. The PHP/RSO is also the primary interface for EnergySolutions with the NRC when requested/as needed by Mallinckrodt.

The **Site Safety Officer (SSO)** will focus on the health and safety aspects of the project operations including the health and safety of the public, environment, and project workforce while performing site activities, excavations, and all associated work activities.

The remaining **Project Workforce** will provide the necessary support during the transition period required to transfer operational responsibility from the former contractor to EnergySolutions. The remaining Project Workforce includes the

EH&S and PHP/RSO Lead, Waste Broker, Field Superintendent, Project Engineer, Laborers and Operators, and Radiation Protection Technicians.

The **Project Support Organization** will provide project support functions. The project support organization will provide technical and engineering support, health and safety, human resources, project controls, contracts, and procurement. This organization will include project and home office/corporate personnel.

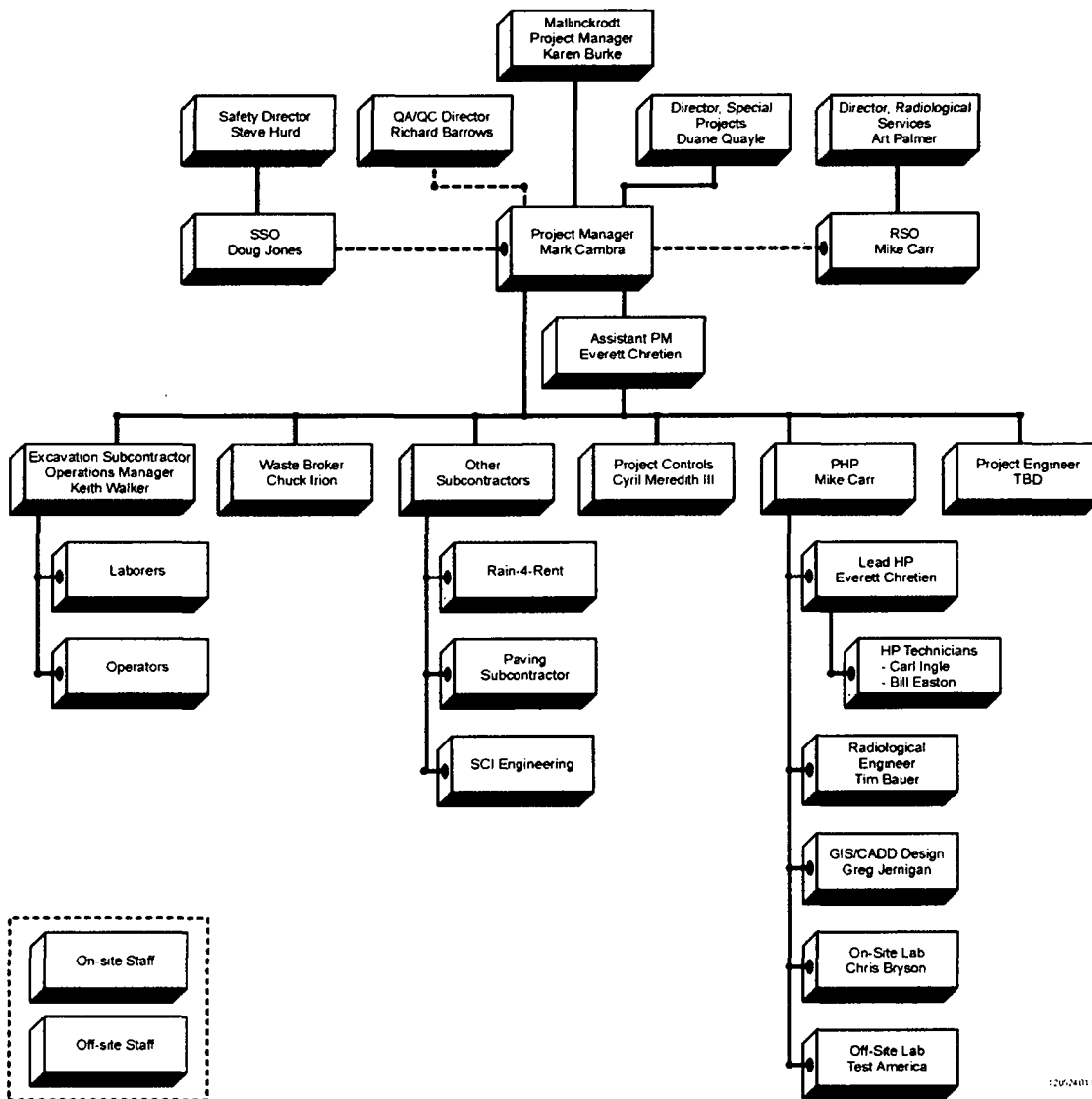


Figure 1: Project Organizational Chart

3.0 Workforce Transition

EnergySolutions recognizes that the current project team possesses critical process, operational, and historical site knowledge; therefore we will work closely with Mallinckrodt to retain those individuals/subcontractors that would ensure a brief but successful transition, thereby ensuring minimal impact to the project.

We expect the discussions and procurement processes to be completed within the first 10 days after contract award. In addition, *EnergySolutions* has already had several of the key personnel walk down the project area and began technical discussions with Mallinckrodt plant personnel to ensure a smooth transition.

During the transition period, *EnergySolutions* will coordinate the required site and project specific training including medical physicals, drug screenings, and background checks. *EnergySolutions* will provide evidence that each employee is fit-for-duty.

4.0 Work Execution

EnergySolutions recognizes the importance of mitigating the impacts to Mallinckrodt's ongoing operations during the transition period and project. We are committed to working closely with Mallinckrodt to safely and quickly transfer operational responsibility. *EnergySolutions* understands that Mallinckrodt has important Licensing and Regulatory requirements that must be strictly adhered to at all times to ensure the compliant and safe operation of this facility. All work will be performed under the Mallinckrodt NRC Radioactive Materials License number STB-401. *EnergySolutions*' mobile NRC Radioactive Materials License 06-20775-01 is not planned to be utilized for this project; however, it may be implemented as necessary.

During the transition period, *EnergySolutions* will review the applicable requirements including the Decommissioning Plan, supporting plans, and operating procedures to ensure the project team has a clear understanding of these commitments. *EnergySolutions* has and will continue to conduct reviews of current activities and identify opportunities for process improvement and efficiency. As a result of these efforts, as necessary, *EnergySolutions* will develop and revise the project plans to ensure these commitments are clearly communicated and understood by the project team. Prior to use of any revised plans, *EnergySolutions* will provide these plans and operating procedures (with changes provided in edit-mode) to Mallinckrodt for its review and acceptance. *EnergySolutions* recognizes the importance of maintaining strict radiological controls, safe work habits, and environmental sensitivity to ensure all work performed is in compliance with Mallinckrodt's NRC License and Facility Safety Basis.

Prior to the completion of the transition period, *EnergySolutions* will perform a management assessment to determine “readiness” of the project prior to commencing operations. The Project Director will be responsible for the authorization to proceed based on the “readiness review”. Upon successful completion of this management review and prior to commencing full scale operations, *EnergySolutions* will ensure that Mallinckrodt is also in agreement with the readiness review.

Upon transfer of responsibility, *EnergySolutions* will assume responsibility for management of waste generated in the course of this project. During transition this will include weekly surveillance of packaged stored waste to ensure that waste is properly contained and stored in authorized locations, the area is properly demarcated and posted, and to identify any packaging deficiencies for correction

EnergySolutions also understands the importance of ensuring the safe and efficient performance of the remaining work scope, and that any delays could have significant impacts on facility operations and/or regulatory commitments. We will work closely with Mallinckrodt to ensure our work is scheduled, coordinated, and integrated with ongoing operations.

5.0 Interfaces

EnergySolutions will interface with both internal and external parties during the transition period. The primary parties identified are Mallinckrodt, *EnergySolutions*, and subcontractors. We understand the sensitivity of transitioning work from one business entity to another; therefore, we will maintain strict professionalism and respect at all times.

EnergySolutions will work closely with the Mallinckrodt support organizations to ensure a smooth transition. These support organizations will include; health and safety, radiation protection, licensing, environmental, quality assurance, plant engineers, and security. During the transition period, *EnergySolutions* will interface routinely with our home office/corporate support organizations. These support organizations will provide the necessary support required to safely and efficiently transition the necessary workforce, equipment, and facilities as well as transfer the operational responsibilities.

The *EnergySolutions* Project Manager will provide Mallinckrodt updates and status regarding the execution of this TP. We will identify any unforeseen or potential issues that may affect the timely execution of this transition.

6.0 Deliverables

The *EnergySolutions* will provide Mallinckrodt our supporting documentation to demonstrate “readiness” prior to transfer of operational responsibility. This

documentation will include; project work plans, management assessment demonstrating readiness, project schedule, applicable fitness-for-duty records, and training records.

7.0 Equipment, Material, and Supplies

EnergySolutions will work closely with the current subcontractors, as applicable, to retain some of the existing equipment inventory to minimize the impacts to current operations and ensure a timely transition. In the event we cannot reach an agreement, we will mobilize the necessary items required to accomplish this work. We have worked with Mallinckrodt to identify the critical items required to support the remainder of this project.

Attachment 1 - Transition Plan Schedule

