



BP CHEMICALS

BP Chemicals Inc.
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Lima, Ohio 45802-0628
(419) 226-1200

40-7604

VIA OVERNIGHT MAIL

Mr. Sam Nalluswami
Low-Level Waste and Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Materials and Safeguards
United States Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Road
North Bethesda, MD 20852

October 24, 1996

Re: License No. SUB-908
Docket No. 040-07604

Subject: REQUEST FOR LICENSE AMENDMENT TO ESTABLISH A PROCEDURE
AND PROTOCOL FOR NRC REVIEW AND APPROVAL OF PROPOSED
FIELD CHANGES FOR THE MIXED WASTE POND CLOSURE PROJECT

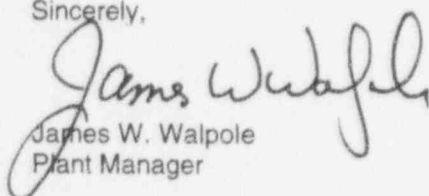
Dear Mr. Nalluswami:

On October 2, 1996, BP Chemicals, Inc. (BPCI) met with NRC staff to discuss the need for a field change authorization procedure during the mixed waste pond closure project. Accordingly, BPCI requests that License No. SUB-908 be amended to establish a procedure and protocol for NRC review and approval of project field changes which may be required during the course of the project. Attached is BPCI Administrative Procedure No. AP-02 entitled "Field Changes" which has been written to address this need. This procedure has already been reviewed by Ohio EPA and that agency's comments have been incorporated in the attached version of the document.

To address field changes which may be needed before AP-02 is incorporated in BPCI's license, the AP-02 procedure as written will be followed and field change requests will be submitted to NRC as described in the procedure.

It is requested that NRC act promptly to approve attached procedure AP-02 and incorporate it our NRC license. If there are any further questions, please give me a call at (419) 226-1201 or call William Rupert at (419) 226-1299.

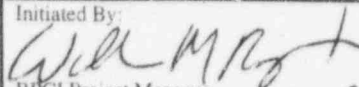
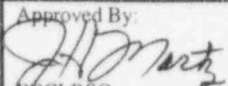
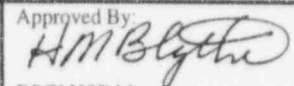
Sincerely,


James W. Walpole
Plant Manager

NK101

cc: Ed Kulzer, USNRC Region 3
Ruth Vandegrift, Ohio Department of Health
Jim Ottarson, Ohio EPA, NWDC

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BP CHEMICALS, INC. MIXED WASTE POND CLOSURE		Administrative Procedure	No. <u>AP-02</u> Revision # <u>0</u> Page 1 of 8
Subject: Field Changes	Effective Date: <u>10/24/96</u>	Initiated By:  BPCI Project Manager Date <u>10-24-96</u>	
	Approved By:  BPCI RSO Date <u>10/24/96</u>	Approved By:  BPCI HSE Manager Date <u>10/24/96</u>	

CONTROLLED COPY # _____

1.0 POLICY

It is the policy of BP Chemicals, Inc. (BPCI) to approve or deny requests for field changes to approved plans and procedures for the Mixed Waste Pond Closure Project prior to the changes being implemented. Where these requests for field changes constitute major changes as defined by Section 4.1.1 of this procedure and are approved by BPCI, BPCI shall submit said requests to Ohio EPA and NRC and receive concurrence prior to enacting said changes. Where the approved changes do not constitute major changes as defined by Section 4.1.1, BPCI shall authorize the changes, report the changes to Ohio EPA and NRC in project progress reports, and document the changes in appropriate project records.

2.0 PURPOSE

The purpose of this procedure is to establish a uniform system for requesting, reviewing and approving field changes.

3.0 RESPONSIBILITIES

3.1 BPCI Project Manager

The BPCI project manager shall receive and log all field change requests. He shall review each request for completion and shall distribute complete requests to any or all of the following project personnel for review, as appropriate: the Certifying Engineer, Radiation Safety Officer and Health, Safety and Environmental Manager. Upon receipt of recommendations for approval or rejection from the reviewing personnel, he shall make the final determination for approval or rejection. For approved field change requests, the project manager shall make the determination as to whether the field change constitutes a major change or minor change and process each change accordingly. He shall notify the requester of the final disposition of each request and shall authorize the requester to implement each approved change.

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3.2 Certifying Engineer, Radiation Safety Officer and Health, Safety and Environmental Manager

The Certifying Engineer, Radiation Safety Officer (RSO) and Health, Safety and Environmental (HSE) Manager shall independently review and approve or reject each proposed field change submitted to them by the BPCI project manager for review. Each reviewer shall complete and sign the Field Change Request Form (Attachment A) and return it to the BPCI Project Manager.

3.3 BPCI Personnel, Contractor Personnel and Outside Engineering Personnel

All BPCI personnel, contractor personnel, and outside engineering personnel are responsible to request field changes to resolve project technical problems and discrepancies, to compensate for differing conditions, and to address issues of project cost, schedule and health and safety. Any requester shall receive authorization for each change prior to implementing that change. The requester shall complete a Field Change Request Form (Attachment A), attach all supporting documentation and submit the request package to the BPCI Project Manager.

4.0 PROCEDURE

4.1 Request Preparation

The person requesting the field change (requester) will fill out the Field Change Request Form (Attachment A) in its entirety and attach all pertinent information to the form to expedite its review. He will then submit the package to the BPCI project manager.

4.2 Request Processing by BPCI Project Manager

The BPCI project manager will log each request in the Field Change Control Sheet (Attachment B). He will review each request for completeness and clarity. If necessary, he may return the request for correction or completion. When the request is complete, he will prepare copies of the request and distribute them to any or all of the following personnel, depending on the nature and impact of the request: the certifying engineer, the BPCI RSO, and the BPCI HSE Manager.

4.3 Certifying Engineer, RSO and HSE Manager Review

The certifying engineer, RSO and HSE manager shall independently review each request submitted to them by the BPCI Project Manager. Each individual shall complete and sign the Field Change Request Form (Attachment A) indicating approval or rejection of each request, and shall return the signed Field Change Request Form to the BPCI Project Manager.

4.3.1 Certifying Engineer shall review all requests which impact either the scope of work, detail plans, specifications, results achieved, cost or schedule.

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4.3.2 BPCI Radiation Safety Officer shall review all requests which impact the handling and onsite disposal of radiological waste as authorized under conditions of NRC License No. SUB-908, or which impact the approved project Radiation Control Plan.

4.3.3 BPCI Health, Safety and Environmental Manager shall review all requests which impact either the approved project Health and Safety Plan or any other health, safety, or environmental issue.

4.4 Field Change Approval

The BPCI Project Manager shall review the recommendations of the Certifying Engineer, RSO and HSE Manager and shall make a final determination to approve or reject each field change request.

4.5 Major versus Minor Determination

The project manager shall determine whether an approved field change request is major or minor according to the following definitions:

4.5.1 A major field change shall be defined as a change that meets one or more of the following criteria:

- (a) Affects the quality of the results achieved;
- (b) Cause a significant change in the project cost;
- (c) Cause a significant change in the project scope;
- (d) Cause a significant delay in the schedule;
- (e) Result in a significant deviation from documentation approved and referenced in License No. SUB-908 and all amendments thereto or the Ohio EPA approved closure plan.
- (f) Has any potential negative impact on safety or environment.

4.5.2 A minor change is defined as any change that does not meet any of the criteria (a) through (f) of section 4.5.1.

4.6 Approved Major Field Changes

The project manager shall submit copies of all approved major field changes to the Ohio EPA and NRC for review and concurrence. He shall work with both agencies to supply them with any information necessary to expedite their reviews.

4.7 Approved Minor Field Changes

For approved minor field changes, the project manager shall inform Ohio EPA and NRC of each change in progress meetings and progress reports, and shall document all minor changes in appropriate project documentation.

4.8 BPCI Project Manager Authorization

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The project manager shall notify the requester and all affected project personnel of each approved field change and shall authorize its implementation.

5.0 DESIGNATION OF AUTHORITY

The BPCI Project Manager, Certification Engineer, RSO and HSE Manager may designate qualified persons to perform any or all duties identified in the procedure. Any designee is subject to BPCI Project Manager approval.

ATTACHMENT A

Field Change Request Form

**BP CHEMICALS, INC.
MIXED WASTE POND CLOSURE PROJECT**

FIELD CHANGE REQUEST FORM

Field Change Number: _____ Date: _____

Subject: _____

Description: _____

Justification: _____

Attachments: _____

Requested by: _____

Signature

Company

Date

BPCI Project Approvals

Dames & Moore		Yes	No	
Certifying Engineer	Signature	Approval		Date

BPCI Radiation		Yes	No	
Safety Officer	Signature	Approval		Date

BPCI HSE		Yes	No	
Manager	Signature	Approval		Date

BPCI Project		Yes	No	
Manager	Signature	Approval		Date

Regulatory Agency Concurrence

Ohio EPA		Yes	No	
Concurrence	Signature	Concur		Date

NRC		Yes	No	
Concurrence	Signature	Concur		Date

ATTACHMENT B

Field Change Control Sheet

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