

134439

WORK INSTRUCTION (WI) FUSRAP - JOB NO. 14501 WI-¹⁰²~~128~~-¹²⁵⁰³²~~062~~ REV. 0
95 SHEET ___ of ___

WI TITLE: Safety and Health Plan for Bliss and Laughlin
EXPECTED COMPLETION DATE: 12/31/95
SITE NAME(S) Former Bliss and Laughlin Steel Co SITE WBS NO. 128
ORIGINATING DEPARTMENT: Safety and Health
IMPLEMENTING DEPARTMENT: Safety and Health

WORK DESCRIPTION AND INSTRUCTIONS:

See Attached document

SUPERSEDES: ATTACHED: QAA, QAA NEED EVALUATION

CONCURRENCE/OPTIONAL - PE OR DEPT MGR. TO DETERMINE

DEPARTMENT/NAME

Mathias Brown
ORIGINATOR

DEPARTMENT/NAME

Benny S. Hester
TEAM LEAD OR GROUP SUPERVISOR

DEPARTMENT/NAME

APPROVED BY: [Signature]
PE OR DEPT. MGR.

NOTE: A DOCUMENT ISSUE MEMORANDUM IS REQUIRED TO IMPLEMENT THIS WI.

CLOSE-OUT (IMPLEMENTING DEPT.)

THE TASK HAS BEEN COMPLETED PER THIS WORK INSTRUCTION.

IMPLEMENTOR (NAME/POSITION): Mathias Brown

DATE: 9-18-95

PE OR DEPT MGR.: Elizabeth Kelly

DATE: 9-18-95

FUSRAP 14008 (1/16/93) RECORD COPY

LBS 21.00

1.0 PURPOSE

This Work Instruction (WI) provides the site-specific health and safety plan for the remedial action at the Former Bliss and Laughlin site located in Buffalo, New York. The instructions provided are adequate to maintain the health and safety of the workers performing the characterization and subsequent cleanup and to protect the general public and the environment. This document contains all the program elements required by 29 CFR 1910.120(b)(4) for a site-specific health and safety plan. The scope of the remedial action involves the cleanup of the radiological and chemical contaminants found at the site as a result of Manhattan Engineering District (MED) work which took place at the facility in the 1950's. Chemical contaminants incidental to the facilities operation and co-mingled with the MED contaminants will be remediated within the scope of this work.

1.1 Site Description

The site is located at 110 Hopkins Street in Buffalo, New York and is presently owned by the Niagara Cold Drawn Corporation (Figure 1). In the fall of 1952, the former Bliss and Laughlin Steel Company performed machining and straightening operations on uranium rods. The finished rods were shipped directly to the Fernald site in Ohio; turnings were returned by the Atomic Energy Commission (AEC) to the Lake Ontario Ordinance Works (LOOW) for packaging and ultimate disposal or recycle. Available records indicate uranium machining occurred at the site during September and October of 1952 and that 53 drums of turnings were generated by Bliss and Laughlin activities. Correspondence dated October 1951, indicates the accumulation of four drums of dry uranium oxides; the nature of the work associated with these uranium oxide drums is unknown. These records probably do not describe the full extent of Bliss and Laughlin activities as no records indicating the total quantity of uranium handled at the site have been located.

Based on the operations performed at this site, the potential radiological contaminant would be processed uranium (i.e.; uranium chemically separated from its long-lived daughter products and in its naturally occurring isotopic abundances). Surveys of the facility, conducted by National Lead of Ohio at the time of the rod turning operations, indicated contamination on the turning machines. The machinery used for this work has been replaced; disposition of the removed machinery is unknown. No records indicating the radiological conditions of the site following uranium machining have been located.

Health Physicists from the Oak Ridge Institute for Science and Technology (ORISE) conducted a radiological survey of the plant in March of 1992. Localized Contamination was found in that portion of the facility known as the "special finishing" area (Figure 2). Total beta activities in the special finishing area ranged from

4,700 to 700,000 dpm/100 cm²; removable alpha and beta activities at these locations ranged from <12 to 430 dpm/100 cm² and <15 to 540 dpm/100 cm² respectively. Surface activity levels at all other building locations were less than the detection limits. Miscellaneous samples (metal chips and floor scrapings) were collected from the floor surfaces where elevated direct radiation levels were detected. These miscellaneous materials were combined for analysis. The results indicated a ratio of U-238 to U-235 typical of natural uranium. No additional uranium series radionuclides were identified in the sample, which indicates the material is processed uranium (i.e.; separated from its longer-lived daughter products). Slightly elevated levels of U-238 were present in oil and sludge samples from the floor trenches and in the dust removed from the overhead surfaces (up to 5.7 Pci/gm). As with the miscellaneous materials uranium decay series daughters were not identified in the samples.

The Bliss and Laughlin facility consists of a single large building, with a floor area of about 12,000 m². There have been only minor changes to the main structure, since the uranium operations in the 1950's. Floor surfaces are generally rough, pitted and covered with a thin layer of oil absorbent material and dried oil and grease. Machining equipment and material storage racks prevent access to some floor surface areas. Ceilings are approximately 12 m high and supported by a framework of trusses. The machining area of the building is open (without inside walls or partitions). The "special finishing" area occupies about 300 m² of floor space. The floor is concrete and contains several shallow utility trenches; there are no floor drains in this area.

2.0 PROCEDURE

2.1 Organization of Responsibilities

The Site Superintendent is responsible for health and safety on site and is the Emergency Response Coordinator (ERC) in the event of a spill or other emergency. The Site Superintendent is responsible for performing the emergency response and notification requirements contained in FUSRAP PP 1.4, and PIs 24.064 and 24.103. and 24.120.

The Site Safety and Health Representative (SSHR) is responsible for implementing the provisions of this health and safety work instruction and performing the following duties:

- Conducting site surveillance
- Issuing and enforcing hazardous work permits (HWPs)
- Conducting site-specific orientation sessions for workers and visitors
- Addressing all health and safety matters that may adversely affect site personnel
- Implementing engineering controls, administrative

protocols, and requirements for personal protective equipment (PPE), or issuing stop-work orders as necessary to protect workers, the general public, and the environment

- Participating in emergency response and notification activities pursuant to PP 1.4, and PIs 24.064, 24.103, and 24.120.
- Ensuring that all Niagara Cold Drawn Corporation Safety Regulations are met.
- Perform Radiological Awareness Training for Niagara Cold Drawn Employees.
- Establish contact and coordinate efforts with local offsite emergency response organizations.
- Secure work areas with NCDC during remediation activities.
- Conducting Weekly Safety Meetings.

2.2 Site Controls

-2.2.1 Security

The site shall be secured in accordance with Niagara Cold Drawn Corporation requirements whenever FUSRAP personnel are not present. Upon arrival at the site, FUSRAP personnel shall report to the area designated by Niagara Cold Drawn Corporation, to notify the organization that FUSRAP personnel will be working in the building or on-site and to obtain access. When leaving, FUSRAP personnel shall secure the work area and notify the Niagara Cold Drawn Corporation designee that all FUSRAP personnel have left the property.

During FUSRAP activities no individual, should be given access to the restricted work areas unless authorized by the Site Superintendent.

2.2.2 Hazardous Work Permits (HWP)

A HWP shall be prepared for each work instruction that involves exposure to contamination in excess of DOE release criteria or potential exposure to airborne radioactivity in excess of 10% of the Derived Air Concentration (DAC).

As a minimum, each of the activities performed inside controlled areas should be covered under an HWP. The HWPs shall be prepared and approved in accordance with FUSRAP PI S7.1, and shall specify the level of PPE and engineering and administrative controls, which the SSHR and Site Superintendent deem necessary to protect FUSRAP personnel, the general public, and the environment.

2.2.3 Restricted Work Areas (RWA)

In order to control access to activities carried out under a HWP and to prevent the spread of contamination, the SSHR shall establish a RWA around the immediate work location. Access to the RWA shall be limited to those individuals satisfying the requirements of Section 3.5. The RWA shall be maintained in accordance with FUSRAP PI S7.2 and shall have a controlled access point at which personnel and equipment are frisked for radiological contamination prior to exiting or removal. Frisking shall be in accordance with the procedures contained in FUSRAP PIs 24.024 and 24.025.

Contaminated personnel shall be decontaminated at the access control point following the procedure in Subsection 2.2.5. Contaminated equipment may be removed from the RWA for decontamination (or storage) at the site if it is in taped double rad bags (10 mil thickness each) and labeled in accordance with Subsection

2.2.4.

2.2.4 Posting and Labeling

All signs and labels shall meet the specifications contained in Chapter 2, Part 3, of the FUSRAP Radiological Control Manual.

- Access points to the RWAs shall be posted.
- The RWA shall be posted with a sign reading "Caution, Contaminated Area" and "HWP Required for Entry".
- Radioactive waste containers (LSA boxes or 55 gallon drums) and rad bags containing contaminated equipment/waste shall not be removed from the site until they are labeled in accordance with the instruction provided in the waste management WI.

2.2.5 Decontamination

Decontamination of FUSRAP personnel, vehicles, and equipment shall be performed in accordance with FUSRAP PI 24.065.

Decontamination, if required, will be performed at the access control point where wash bottles with detergent and rinse water, paper towels, and a catch basin for contaminated water shall be maintained as needed. The SSHR shall specify appropriate PPE for personnel performing decontamination. The standard decontamination procedure should be as follows:

1. Clean off all visible dirt and perform dry decontamination by gently brushing and dry wiping the affected area(s): more rigorous, abrasive methods may be used with equipment. Resurvey the area to evaluate the effectiveness of the cleaning.

2. If after several attempts dry cleaning techniques do not reduce contamination to below DOE release criteria, paper towels dampened with water and a mild detergent should be used. The affected area should be allowed to dry (if alpha measurements are being made) and resurveyed after each wipe down. Save paper towels for possible disposal as rad waste.
3. Flushing the affected area with water and detergent should only be attempted when required for personal decontamination after dry and damp cleaning have proven ineffectual. Equipment that remains contaminated should be packaged in accordance with the waste management WI. The water used for personal decontamination must be collected for future processing and/or disposal as contaminated liquid in accordance with the waste management protocol.

If personnel contamination remains after these steps, the S&H Coordinator must be contacted for approval to employ stronger cleaning substances or more abrasive procedures.

Contaminated waste materials shall be placed in 10-mil plastic rad bags. Written guidance covering packaging and transport requirements is provided in a waste management WI.

2.2.6 Dust Control

Dust control measures, such as HEPA (high efficiency particulate air) vacuuming and dampening of areas to be decontaminated, and bagging of contaminated equipment, shall be undertaken to minimize potential exposure of personnel to airborne radioactivity and the spread of contamination. The SSHR may incorporate approval for HEPA vacuum use in a HWP. If the HEPA vacuum unit does not have adequate documentation that it has been tested and shown to meet DOE requirements, then respiratory protection should be used during operation or the HEPA vacuum replaced with one that has adequate documentation. Respiratory protection shall be specified by the SSHR.

2.2.7 Air Monitoring

Area air sampling, performed in accordance with the procedures contained in FUSRAP PI 24.023, shall be executed to demonstrate compliance with DOE 5400.5 Derived Concentration Guides (DCGs). Air samples shall be collected using an Eberline RAS-1, or equivalent, air sampling pump with glass fiber collection filter deployed between the RWA and the primary access.

If specified by the SSHR, personal air sampling shall be performed in accordance with FUSRAP PI 24.023, using a personal sampling pump and lapel collection filter worn by each worker or a single representative worker having the highest potential for airborne exposure.

If diesel or gasoline fueled equipment is operated within the plant, air monitoring for percent oxygen (O₂) and carbon monoxide (CO) shall be performed in accordance with FUSRAP PI 24.086. Continuous air monitoring with direct reading instruments shall be performed during equipment startup and decreased to intermittent measurements thereafter, provided the initial measurements indicate O₂ levels are within the range of 19.5 to 22 percent and CO levels are less than 5 ppm. If the O₂ level falls below 19.5% or the CO level exceeds 5 ppm, the equipment shall be shut down and the building evacuated and ventilated until normal atmospheric conditions return.

2.2.8 Confined Space Entry

Entry of a confined space is not anticipated at the Bliss and Laughlin site. If the need for confined space entry is identified, authorization to proceed must be obtained from the S&H Supervisor and the property owner (Niagara Cold Drawn Corporation) and the S&H Work Instruction must be modified to incorporate the safety requirements as identified in FUSRAP PI S1.11.

3.0 HEALTH AND SAFETY

3.1 Chemical Hazards On Site

Chemical Hazards have not been identified as being present on-site. However, in the process of performing the remedial action, it is possible that hazardous chemicals will be used as part of the remediation/treatment effort. These chemicals will be approved for use on site in accordance with FUSRAP PI S1.5.

3.2 Radiological Hazards On Site

Radiological surveys performed on site are summarized in Section 1.1. Based on the results of these surveys, the principal radiological hazard is introduction of radiologically contaminated media (oils, sludges, dirt, etc.) into internal exposure pathways: inhalation, ingestion, injection and skin contamination leading to absorption. Radiological controls may therefore be limited to the use of PPE to screen against alpha contamination resulting from skin/personal clothing contact during tasks which may disturb radiologically contaminated media.

3.3 Physical Hazards and Other Hazards

3.3.1 Eye and Face Hazards

Environmental sampling techniques such as drilling of boreholes, may result in potential face and eye hazards. It is deemed appropriate, in accordance with FUSRAP PI S1.6, the SSHR may require the use of double eye protection (face shields plus safety glasses) by personnel performing these procedures.

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3.3.2 Noise

Noise levels may exceed 85 Db(A) - the sound threshold at which participation in the hearing conservation program is required. The SSHR shall determine if sound levels exceed 85 Db(A) and, in accordance with FUSRAP PI S1.7, require the use of hearing protection as needed.

3.4 Task-By-Task Hazard Analysis

TASK(s)	HAZARD	CONTROLS
Decontamination	Flying Fragments	Use of eye/face protection meeting ANSI Z87.1 standards in accordance with FUSRAP PI S1.6
Potentially all tasks.	Tripping & Falling.	Stress awareness of tripping hazards during site-specific training. Use "Caution" ribbon to establish walkways. Restrict use of over-head catwalks. Use ladders, when needed, in accordance with PI S9.3
Potentially All Tasks	U-238 Contamination	Use of protective clothing and respiratory protection in accordance with FUSRAP Pis S1.6 and S1.2; perform frisking of personnel and equipment in accordance with Pis 24.025 and 24.026; perform decontamination, when needed, in accordance with PI 24.065; employ dust control measures.
Potentially All Tasks	Noise [>85 Db(A)]	Use of hearing protection and participation in the FUSRAP hearing conservation program. (FUSRAP PI S1.7)
Potentially All Tasks	Power Tools	Inspect power tools prior to use. Operate power tools in compliance with FUSRAP PI S9.8.

3.5 Worker Qualification

3.5.1 Training

Workers shall have current training meeting the requirements of 29 CFR 1910.120 and FUSRAP PIs. The training required by each of these FUSRAP PIs need not be repeated at the Bliss and Laughlin site if it had been received through FUSRAP within the last 12 months.

Site-specific training for workers and visitors shall be presented in accordance with FUSRAP PI 24.042.

Hazard communication training shall be presented in accordance with FUSRAP PI S1.5. This training need only be limited to the hazardous substances brought on site if the other required topics of the training have been received by site personnel at a FUSRAP site within the last 12 months.

Weekly tool-box safety meetings shall be conducted by the SSHR to apprise workers of the requirements of the HWPs under which they will work, to provide updates on site conditions and applicable safety and health requirements.

3.5.2 Medical Surveillance

Medical surveillance requirements for Bliss and Laughlin site workers are described in FUSRAP PI 24.083. All personnel who are expected to take part in the site cleanup are presently participating in the medical surveillance program. If subcontractor personnel are required, workers should be selected from the pool of subcontractor employees who are current participants in the medical surveillance program.

A site visitor may be granted access to a controlled area without participation in the Medical Surveillance Program provided:

- The use of respiratory protection equipment or other stressful PPE is not required;
- The visitor does not spend more than 30 days per year at a FUSRAP site;
- The visitor is not exposed to contaminants of concern in excess of applicable exposure criteria;
- The visitor is escorted at all times by the Site Superintendent or qualified designee;

Visitor access to a controlled area shall require the approval of the H&S Supervisor on a case-by-case basis. BNI personnel will not be granted visitor status. They must have current HAZWOPER training and be enrolled in the medical surveillance program before being granted access to Controlled Areas.

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3.5.3 Bioassay

Bioassay analysis shall be performed to determine if U-238 is being taken into the body via any of the applicable exposure pathways. Bioassay for non-radioactive contaminants is not required. Requirements for undergoing bioassay monitoring are contained in FUSRAP PI 24.084.

Personnel who are expected to work at the Bliss and Laughlin site are presently enrolled in the FUSRAP personnel monitoring program. If subcontractor personnel are required, workers should be selected from the pool of subcontractor employees who have not had an off-FUSRAP occupational exposure to radioactive material and are current participants in the bioassay program or who have FUSRAP bioassay results which can be used for baseline data.

A site visitor may be granted access to a controlled area, without participation in the bioassay program provided:

- He/she has been offered the opportunity to participate in the bioassay program (pursuant to PI 24.084)
- The condition(s) for which the area is controlled can be adequately regulated so that the visitor shall not be exposed to an airborne concentration of U-238 at or above 10% of the DAC;
- The use of respiratory protection equipment is not required;
- The visitor does not spend more than 30 days a year at a FUSRAP site;
- The visitor is escorted at all times Site Superintendent or a qualified designee.

Visitor access to a controlled area shall require the approval of the FUSRAP H&S Supervisor on a case-by-case basis.

3.6 Personal Protective Equipment

Use of personal protective equipment shall be in accordance with FUSRAP PI S1.2 and PI S1.6.

3.6.1 Minimum PPE (Level D)

Minimum personal protective equipment at the Bliss and Laughlin site shall consist of hard hat meeting ANSI Z.89.1 standards, safety glasses or goggles meeting ANSI Z 87.1 standards, sturdy leather work shoes, long pants, and sleeved shirt.

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3.6.2 Contamination Present - No Airborne (Modified Level C)

Minimum protective equipment for entry of a RWA where there is little likelihood of airborne radioactivity in excess of 10% of the U-238 DAC shall consist of Level D equipment, Tyvek coverall (with hood) taped at the ankle and wrist cuffs, surgical gloves and outer cotton gloves, and plastic shoe covers.

3.6.3 Contamination and Airborne Radioactivity Present (Level C)

If there is a potential for airborne radioactivity exceeding 10% of the U-238 DAC, PPE shall consist of Level D and modified level C requirements, a full face negative pressure air purifying respirator (APR) with high efficiency particulate air (HEPA) cartridges. The APR shall be taped to the tyvek hood.

3.6.4 Other PPE

The SSHR shall require the use of additional PPE such as face shields and hearing protectors, as required, on a task-by-task basis, such requirements will be documented on the appropriate task HWP.

3.7 Emergency Response and Notification

Fire, injury, or other emergencies shall be immediately reported to the Site Superintendent and/or SSHR. The Site Superintendent will be responsible for making the necessary notification to Niagara Cold Drawn Corporation safety and security personnel. Emergency response and notification procedures for BNI work at the Bliss and Laughlin site will comply with the notification requirements of FUSRAP, which are detailed in the FUSRAP Health and Safety Plan, FUSRAP Project Procedure (PP) 1.4 "Occurrence Categorization, Notification, and Reporting, and FUSRAP Project Instructions (PIs) 24.013 "Safety, Injury, and Occupational Illness Reporting", and 24.064 "Emergency Response and Notification Planning". In addition, the provisions of Project Instruction 24.120 "Controlling Spills of Hazardous Material" shall be followed in the event of an accidental off-site release of contaminated material.

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When responding to emergencies, the Site Superintendent, or designee, shall be responsible to contact the appropriate BNI management personnel and emergency services. Emergency services for the Bliss and Laughlin site are:

AMBULANCE..... 911 or [(716) 681-6070]
POLICE..... 911 or [(716) 851-4444]
FIRE..... 911 or [(716) 851-5333]
HOSPITAL..... Mercy Hospital of Buffalo
565 Abbott Road
Buffalo, NY 12240
(716) 826-7000

Poison Control Center	(313) 745-5711
REAC/TS	(615) 576-3098
FUSRAP Switchboard	(615) 576-1699
Project Manager: Paul Huber	(615) 576-4274
FUSRAP H&S Supervisor: Benny Houser	(615) 574-3968
S&H Coordinator: Marti Brown	(615) 574-3948

3.7.1 Occupational Injuries

Workers shall report all occupational injuries to the Site Superintendent. A first-aid kit and an individual certified in First Aid shall be on site during remedial action activities; personnel designated by the S&H Coordinator or SSHR may use the kit to administer first aid to a worker who is not seriously injured. The SSHR will maintain a first aid log.

A severely injured worker shall be transported to Mercy Hospital by ambulance. Figure 1 includes a route from the site to the hospital. When emergency assistance is requested, affected emergency response personnel will be notified of the types and concentrations of any contamination on site. If an injured worker has been working in a restricted area, the SSHR, or designee, will conduct a radiological survey of the area before the ambulance arrives. If possible, the area will be decontaminated to ALARA levels [established in the FUSRAP ALARA Plan (BNI-1992a)] before emergency workers enter it; however, if an injured worker requires immediate medical attention, emergency response personnel may enter an RWA without regard for radiological contamination. If entry into a radiologically controlled area is made by emergency response personnel, then they must submit to proper survey and decontamination procedures when the emergency is over.

The hospital shall be notified if they are to receive a contaminated victim. If a worker sustains injuries that cause internal contamination, the site superintendent or SSHR must contact the FUSRAP S&H Supervisor at the BNI office in Oak Ridge, Tennessee (see telephone listing above).

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Personnel who have been trained and carry a valid CPR card may administer cardiopulmonary resuscitation (CPR) to an injured worker if at least one person in the rescue party possesses a valid CPR/first-aid certification card, and existing hazardous conditions do not threaten the lives of rescue workers.

3.7.2 Fire

Anyone discovering a fire shall:

- Immediately notify the Site Superintendent (who will notify Niagara Cold Drawn Corporation) and all other members of the site team;
- Immediately contact Fire Department if the fire cannot be extinguished with portable equipment;
- Attempt to extinguish it, only if the fire is small, there is a reasonable probability of success, individuals trained in fire fighting are available, and doing so does not place the individual at risk;
- Evacuate the building with other members of the site team if the fire appears uncontrollable.

3.7.3 Spills

Any spill or release of contaminated waste shall be handled in accordance with FUSRAP PI-24.120.

Only small amounts of liquids are expected to be used at the Bliss and Laughlin site for personnel decontamination. These would not be of sufficient volume or radionuclide concentration to present a spill hazard.

4.0 APPENDICES

4.1 QAA Need Evaluation Form

See Attachment

4.1 Health and Safety Equipment List

4.1.1 Personal Protective Equipment

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Tyvek coveralls (with hood) Full face air purifying respirators Safety glasses/goggles Face shields Cotton work gloves	Duct tape HEPA respirator cartridges Hard hats Ear plugs/muffs Surgical gloves Plastic shoe covers Sturdy work shoes
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4.1.2 Recommended Safety Supplies/Equipment

Wash bottles and mild detergent Paper towels Brush/Broom Rad Bags (10 mil) O ₂ Meter CO Meter α Scintillation Survey Meter Personal Air Sampling Equip. Two Way Radios Drum Dolly Portable Telephone	Plastic Basin Spray Bottle Caution Ribbon (Yellow) Shovel Flex Duct (75') - for venting exhaust of gas powered equipment. Sound Level Meter Pancake Type GM Survey Meter Area Air Sampling Equip. Fire Extinguisher Smears Signs and Postings
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4.2 Personnel Listing

- Site Superintendent - TBD
- Site Safety & Health Representative - TBD
- Radiological Support Supervisor - TBD
- Health Physics/Industrial Hygiene - TBD

Other site workers or site visitors may be approved by the FUSRAP H&S Supervisor for site access.

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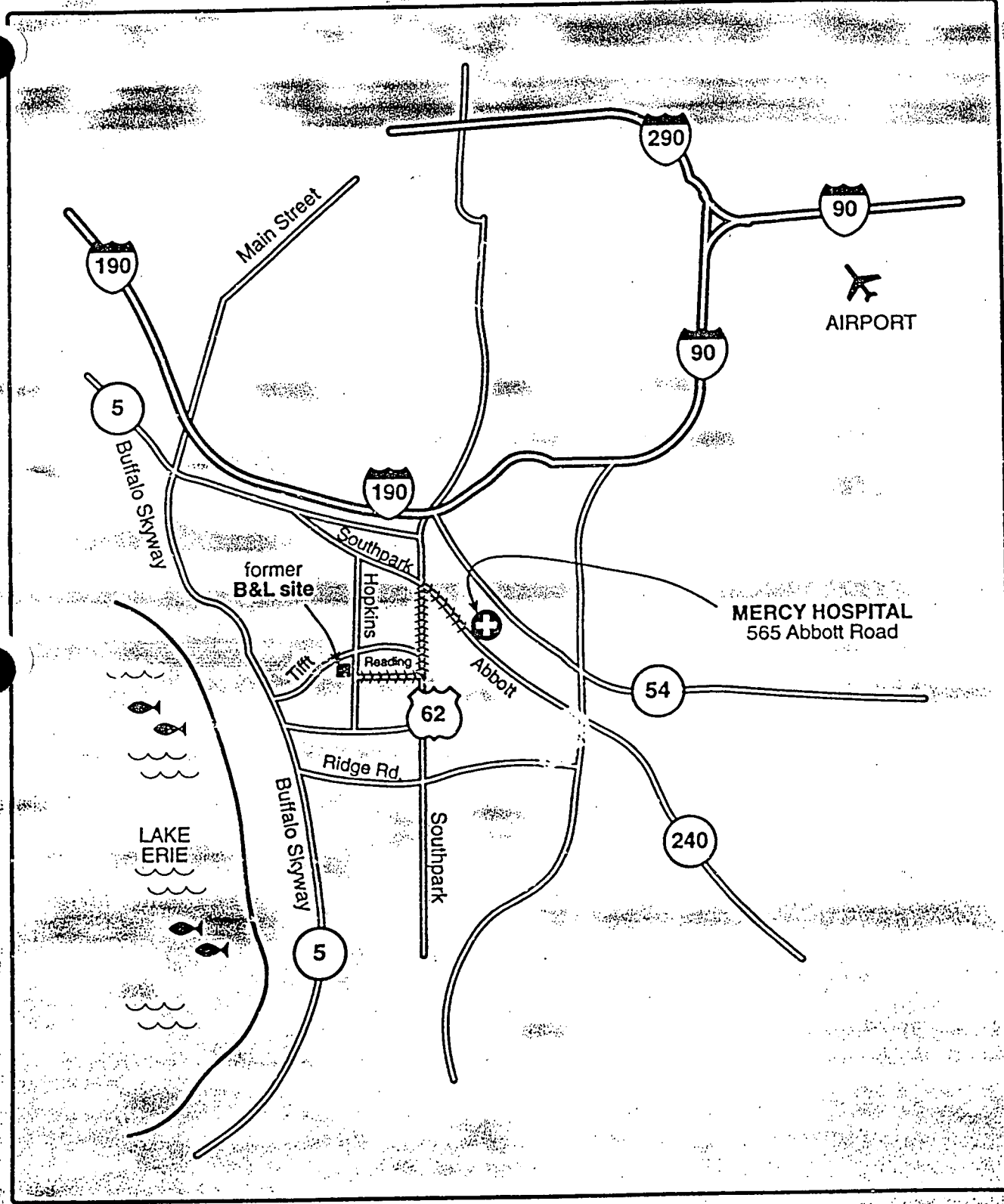


Figure 1
Location of Former Bliss and Laughlin Steel Company Facility
and Route to Hospital

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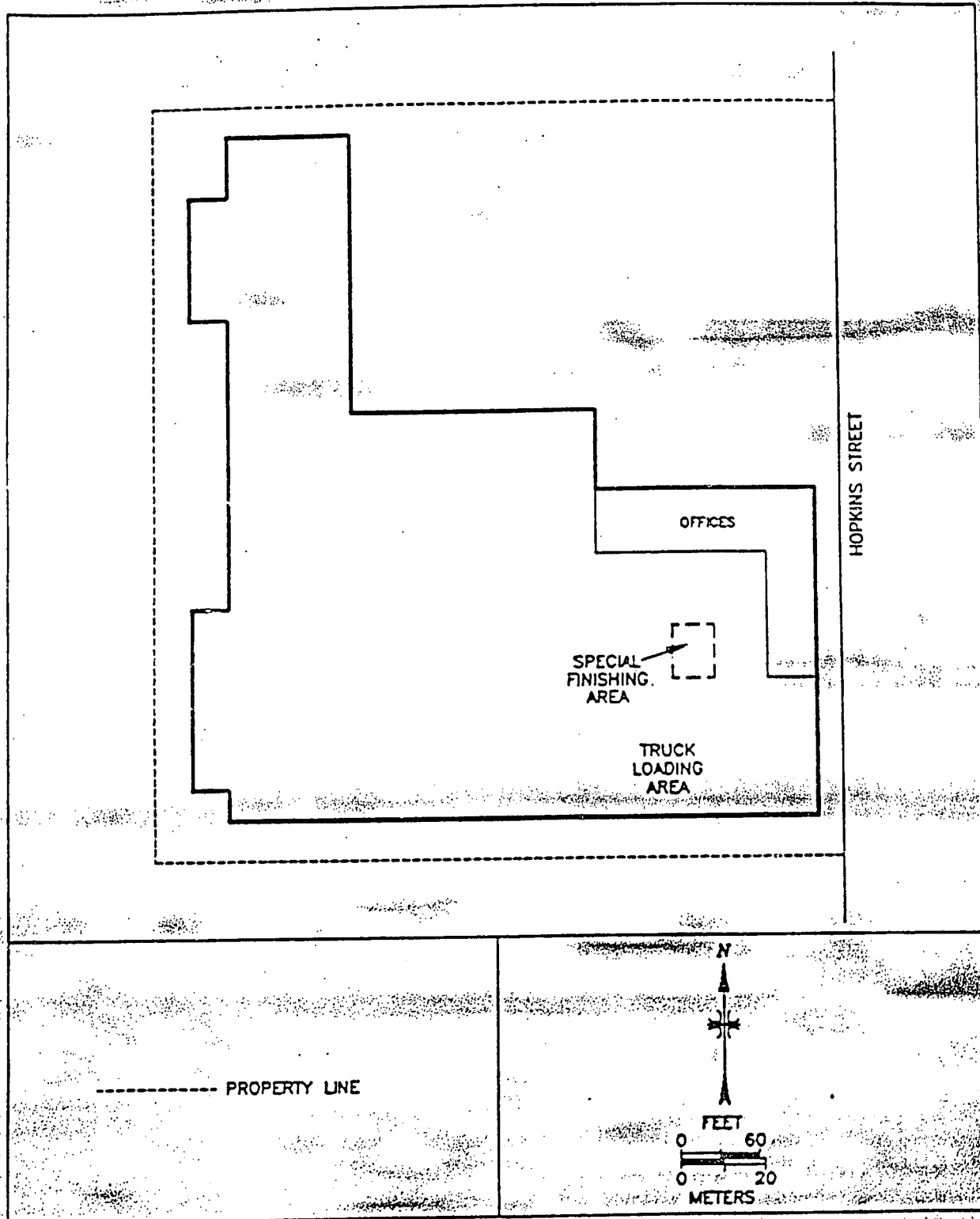


FIGURE 2: Plot Plan of Former Bliss and Laughlin Steel Company Facility



QUALITY ASSURANCE ASSESSMENT (QAA) NEED EVALUATION

Site Identification Bliss and Laughlin

Field Activity Description:

Safety and health requirements for characterization and remediation activities associated with the former Bliss's Laughlin Steel Company.

Justification that QAA is not applicable for this work activity:

Safety and health considerations covered in B&L Safety Envelope and B&L QAA associated with WI on characterization and remediation of the site. (QAA-128A-01)

	Concurrence ESH&WM Manager
Originator	
Sign <i>Paula Brown</i>	<i>R. J. [unclear]</i>
Date 1-11-95	1-11-95