

December 19, 2012

CD12-0315

Mr Rusty Lundberg
Director
Utah Division of Radiation Control
195 North 1950 West
P O. Box 144850
Salt Lake City, UT 84114-4850

RECEIVED
DEC 19 2012
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Re: Radioactive Material License Nos. UT 2300249 and UT 2300478 Response to Request for Information for Appendix I, Organization Submittal

Dear Mr Lundberg

EnergySolutions hereby submits additional information in response to the Utah Division of Radiation Control's request dated 14 December 2012, regarding EnergySolutions' revised *Organization* submittal of 24 October 2012. In order to authorize revision of Radioactive Material Licenses UT 2300249, the Division requested additional detail for the following items:

- 1. REQUEST: The individual who holds the position of Vice President of Clive (proposed change in title Vice President and General Manager, Clive Facility) has changed. Please provide the individual's qualifications.**

RESPONSE: Enclosed please find a current resume for James Miller, Vice President and General Manager, Clive Facility

2. **REQUEST: In the proposed changes to Appendix I, the positions of Director of Mixed Waste Operations and Containerized Waste Facility (CWF) Manager have been deleted. Under the proposed restructuring, what job positions have taken over the responsibilities for the Mixed Waste and CWF facilities? Provide the qualifications for the individual. If the person is the Manager, Waste Disposal Operations justify how one person can adequately manage all four facilities that have to be followed for compliance and safety purposes.**

RESPONSE: Attached please find a current resume for Dave Squires, Manager, Waste Disposal Operations (formerly the Director of LLRW Operations) Under the previous revision of the Clive Organization in 2001, the Containerized Waste Facility Manager reported to the Director of LLRW Operations (filed in conjunction with RML amendment 13, approved 9 October 2001) Therefore, the proposed revision provides no functional change in this respect The change in stewardship for Mixed Waste operations reflects the significant reduction in volumes being received EnergySolutions managed an annual peak of 25.7 million cubic feet of material at its Clive Facility in 2005 By comparison, this year's projected total waste volume for the Clive Facility will be approximately 2.5 million cubic feet (i.e., 10% of the peak volume) The Manager, Waste Disposal Operations has over 20 years of waste and project management experience, (with 8 years at the Clive Facility), including familiarity with Mixed Waste facility requirements EnergySolutions' existing Mixed Waste and CWF subject matter experts and Quality Assurance team will continue to support the Manager, Waste Disposal Operations

3. **Provide an explanation/justification for eliminating the HPT (RST) III positions.**

RESPONSE: The qualifications for Health Physics Technician IIIs are identical to those for Health Physics Technician IIs, in that they *“must have a high school diploma or equivalent, three years working directly with radioactive material and two years direct Health Physics experience equivalent to the HP Technician I level, or an equivalent combination of education and experience, ability to pass the HP II exam, valid driver's license, and be physically able to meet all requirements of the job”* Similarly, the roles and responsibilities for the HPS III position are identical to those for an HPS II Because there is no difference between the positions in terms of License compliance, there is no need to maintain them as distinct positions

4. **Justify changing job titles for positions that are referenced in both RMLs and other documents (i.e., Standard Operating Procedures, RML Applications and Appendices, CQA/QC manual, etc.). Many of the job title changes were the only significant change, actual job function, responsibilities, and qualifications did not change. For example, changing the title of Director Health Physics to Manager of Health Physics and Safety (RSO) is trivial and unnecessary.**

RESPONSE In early October 2012, EnergySolutions' management instituted an overall change in corporate structure that included changes in titles for several of Clive's managers and operators. As is noted in the Division's request, most of these changes were functionally "trivial," being made to enhance uniformity within EnergySolutions' management structure. Since they are not tied with any changes in EnergySolutions' ability to continue to demonstrate regulatory compliance and a culture of environmental safety, there is no regulatory basis for denying the revisions.

No revisions are proposed to the Organization submitted on October 24, 2012 as a result of this request for information. If you have any questions regarding this issue, please contact me at 801-649-2000.

Sincerely,



Sean McCandless
Manager, Compliance and Permitting

cc John Hultquist, DRC
Ryan Johnson, DRC



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ATTACHMENT
JAMES MILLER RESUME
VICE PRESIDENT AND GENERAL MANAGER
CLIVE FACILITY



JAMES A. MILLER

Experience Summary:

Mr Miller has over 24 years experience on commercial and government decontamination and decommissioning and demolition projects in operations and project management with extensive experience in the nuclear fuel conversion, fabrication, and manufacturing process Experienced in short- and long-range planning, scheduling, budgeting, and variance/performance reporting Certified Radiation Protection Technologist (NRRPT) specializing in the unconditional release of potentially radioactive contaminated material and facilities and transportation of radioactive material Waste management experience includes handling, processing, material characterization, dose monitoring, packaging, transporting, manifesting, and dispositioning RCRA/TSCA hazardous, LLW, MLLW, and Special Nuclear Material Proficient in computer programs including, Primavera P3/P6, Success Estimator, RS Means, AutoCad, LowTrack, Microshield, CAP 88, COMPLY, RADMAN, RESRAD, Particle Deposition software, and Windows-based instrument operation and calibration software

Education/Qualifications:

- Pellissippi State Community College
- Roane State Community College (major Pre-Engineering)

Training/Certifications:

- DOE Advanced Radioactive Materials Packaging and Transportation
- National Registry Radiation Protection Technologist (NRRPT) – Certified 1995
- RESRAD and RESRAD-Build Workshop Training
- DOE Security “L” Clearance (Inactive)
- Project Emergency Warden (EOC qualified)
- Emergency Planning and Response
- Integrated Safety Management System (ISMS)
- Authorized Derivative Classifier
- 40 hr HAZWOPER Training (29 CFR 1910 120)
- 8 Hr HAZWOPER Supervisor Training (29 CFR 1910 120)
- 49 CFR, Transportation Specialist Training
- Nuclear Criticality Safety

Employment History:

9/2012 to present:
EnergySolutions, LLC

Clive, Utah

Vice President and General Manager, Clive Facility

The Vice President is responsible for the overall operations of the Clive organization and will lead, direct, and oversee all operations including production scheduling, staffing, programs, and safety compliance The organization includes the Clive Operations and Logistics groups The Clive organization is responsible for providing disposal and transportation and logistics services for the nuclear industry including nuclear power plants, radiopharmaceuticals, universities, fuel fabrication, industrial facilities, and municipal grounds Work directly with the Business Development department to procure new business and expand current and future business opportunities for the company Responsible for fostering leadership principles and vision consistent with Corporate goals, values, and objectives Responsible for the financial performance of the organization and controlling an annual operating budget in excess of \$90M

7/2011 to 9/2012:
EnergySolutions, LLC

Oak Ridge, Tennessee

Vice President, Global Commercial Group TES – Projects and Services

The Vice President is responsible for the overall strategy of the TES Project Services organization and will lead, direct, and oversee all operations including P&L responsibility, production scheduling, staffing, programs, and safety compliance. The organization includes the Utility, Non-Utility, and Utility Plant Services groups. The TES Project Services organization is responsible for providing a broad service (e.g., demolition, decontamination, remediation, liquid waste processing, waste characterization, emergency response, final status survey, etc.) throughout the nuclear industry including nuclear power plants, radiopharmaceuticals, universities, fuel fabrication, industrial facilities, and municipal grounds. Work directly with the Business Development department to procure new business and expand current and future business opportunities for the company. Responsible for fostering leadership principles and vision consistent with Corporate goals, values, and objectives. Responsible for the financial performance of the organization and controlling an annual operating budget in excess of \$40M.

12/2006 to 7/2011:
EnergySolutions, LLC

Oak Ridge, Tennessee

Director, Commercial Decommissioning Services and Shipyard Operations

Responsible for managing the multiple large and small scale projects with contract values ranging from \$500k up to \$20M. Projects include, Morris Fuel Reprocessing Canyon Facility, US Navy Defueling Structures, US Navy Barge, Wilmington Fuel Manufacturing Facility, BWXT Lynchburg Nuclear Fuel Plant. Oversee the development of work scopes, policies and procedures for equipment operations, maintenance, repair and calibration. Responsibilities also include managing sub-contracts with contract values in excess of \$500k. Responsible for safety, planning, scheduling, budgeting, financial tracking, and oversight of a staff of approximately 100 manual and non-manual personnel, maintaining up to 7 day operations, and controlling an annual operating budget in excess of \$28M.

8/2006 to 12/2006:
EnergySolutions, LLC

Oak Ridge, Tennessee

Project Manager

Responsible for managing the Honeywell Metropolis UF6 Conversion Plant - Legacy Waste Project with a contract value of \$11.25M. This scope of work included the characterization, loading, and shipping offsite of ~4,600 tons of scrap metal contaminated with residual amounts of U3O8 and UO3 powder. Oversee the development of work scopes, policies and procedures for equipment operations, maintenance, repair and calibration. Responsibilities also included managing sub-contracts with contract values up to \$500k. Responsible for safety, planning, scheduling, budgeting, and oversight of a staff of approximately 30 manual and non-manual personnel, maintaining a 4-6 day operation, and controlling an operating budget of \$11.25M.

2/2006 to 8/2006
EnergySolutions, LLC (formerly BNG America)

Oak Ridge, Tennessee

Project Manager

Responsible for managing Paducah Gaseous Diffusion Plant - Northwest Scrap Metal Project, contract value \$50M. Manage characterization, processing, loading, and shipping offsite of over 19,600 tons of scrap metal contaminated with Enriched Uranium. Oversee development of work scopes, policies and procedures for equipment operations, maintenance, repair and calibration. Manage \$4M in sub-contracts. Responsible for safety, ISMS, planning, scheduling, budgeting, and oversight of a staff of approximately 60 manual and non-manual personnel, maintaining a 4-6 day operation and controlling \$50M operating budget.

12/1997 to 1/2006.
EnergySolutions, LLC (formerly BNG America)
K-25 Gaseous Diffusion Plant

Oak Ridge, Tennessee

Project General Manager

Completion of the world's largest D&D/Demolition Project – ETP Three Building Project. Primary responsibilities included demobilization of equipment, facilities, and personnel in addition to implementing closure of programs such as radiological protection, waste management and transportation, health and safety, criticality safe-

ty, and quality assurance Managed physical work, interfaced with DOE, led contract and claims negotiations and contract close out Performed operations during closure phase, while maintaining required safety and ISMS programs consistent with Category 2 Nuclear Facility requirements Managed subcontracts with values up to \$15M

Responsible for safety, planning, scheduling, budgeting, and oversight of a staff of approximately 260 manual and non-manual personnel, maintaining a seven-day operation, and controlling an annual operating budget of \$60M

Decon/Final Status Survey and Waste Operations Manager

Responsible for technical and administrative oversight of radiological decontamination and survey for unconditional release of ~18,000,000 ft² of building surface area and transportation and disposal waste on the ETTP 3-Building Decommissioning & Decontamination and Metals Recycling Project Oversaw development of work scopes, policies and procedures for equipment operations, maintenance, repair and calibration Responsible for safety, planning, scheduling, budgeting, and oversight of a staff of approximately 450 manual and non-manual personnel, maintained 24/7 operation, controlling \$28M annual operating budget

Shift Manager

Responsible for coordinating and directing overall site and building work activities conducted on the ETTP work shift Maintained authority over and responsibility for facility operations occurring on shift, including activities performed by tenant organizations Ensured compliance with safety regulations/requirements and the facility Authorization Basis Served as point of contact for DOE customer interface, emergent conditions and project emergency warden Coordinated site-wide resources, personnel, task assignments and equipment

Compactor Operations Manager

Responsible for ensuring technical and administrative operations of BNFL Supercompaction Facility met site safety requirements and company volume and schedule milestones as well as operational budget expectations Managed largest radioactive material compaction operation in the United States, with an actualized output of over 2.3M pounds of waste per week and responsible for processing 200M pounds of waste Oversaw 100 craft staff, maintaining a safe 24-hour, seven-day operation and an annual operating budget of \$6.8M Oversaw work scopes development, policies and procedures for equipment operations, maintenance, repair and calibration Interfaced with removal operations personnel and support organizations to ensure continuous output supporting decommissioning of over 1M ft² of contaminated process equipment Negotiated approval from DOE for start-up operations in a minimal amount of time to obtain maximum benefit of compaction in the largest active DOE decommissioning operation Successfully passed multiple conducts of operations, health and safety, radiation control and environmental audits and reviews

Survey and Transportation Manager

Responsible for technical and administrative oversight of radiological survey for unconditional release of 12,000 tons of materials and items, Non-Destructive Assay (NDA) program, radiological characterization, and transfer of Class 7 (radioactive) material from the ETTP 3-Building Decommissioning & Decontamination and Metals Recycling Project Developed and defended technical papers and justifications based on gaseous diffusion operational history to allow for rapid real time characterization of process equipment Planned, scheduled, budgeted and managed 50 staff Work verified by an Independent Verification Team (IVT-DOE) with a less than 0.1% rejection rate Proved ability to meet safety, schedule, cost, and quality goals and was promoted to Supercompactor Manager

12/1995 to 12/1997.

Molten Metal Technology Center

Oak Ridge, Tennessee

Health Physics Supervisor/ Instrumentation Specialist

Held technical and administrative oversight of radiological monitoring instrumentation, external and internal dosimetry, environmental and effluent monitoring, radwaste, and health physics training Reviewed and accepted hazardous waste manifest and/or low-level waste manifest for mixed and low-level waste identified for receipt and transfer, verifying total isotopic data against site radioactive material license limits Served as alternate Radiation Safety Officer (RSO)

6/1995 to 12/1995:
Allied Technology Group

Oak Ridge, Tennessee

Health and Safety Technical Administrator

Served as the health and safety technical administrator. Directed development and implementation of new health and safety technician training program to satisfy regulatory requirements. Performed daily inspections of ORNL waste management facilities to ensure conditions of controlled sites were maintained in accordance with DOE Orders. Supported decontamination and treatment activities for PCBs in K-33 building at ETTP K-25 site.

3/1995 to 6/1995:
Thermo-Analytical/ Eberline

Oak Ridge, Tennessee

Radiation Control Technician

Assessed Radioactive Shipments for Compliance with 49 CFR requirements. Reviewed and enforced ALARA principles with radworkers and maintained compliance with hazardous work permits. Responsible for air monitoring and analysis of possible radioactive materials using various field and laboratory instruments.

9/1988 to 3/1995:
American Ecology Recycle Center

Oak Ridge, Tennessee

Health and Safety Technician

Performed routine calibration and maintenance of all radiological monitoring equipment (RME) for daily assessment of Radiological Controlled Areas. Calculated DAC values for recommendation of respiratory protection requirements. Maintained documentation for ensuring regulatory compliance. Performed radioactive waste shipments in compliance with 49 CFR requirements. Performed daily source and efficiency checks on field and lab. Held various supervisory and special project assignments.

Affiliations/Other:

- National Registry of Radiation Protection Technologists Membership
- Project Management Institute Membership
- East Tennessee Chapter Project Management

Papers:

- N/A

ATTACHMENT

DAVID SQUIRES RESUME

MANAGER, WASTE DISPOSAL OPERATIONS

CLIVE FACILITY

David Squires

Qualifications

EnergySolutions, Salt Lake City, Utah

2004 – Present

Manager, Waste Disposal Operations

Over 20 years of Project/Construction Management experience with a proven track record of projects, including several multi-million dollar projects, completed on schedule and within budget. Highly skilled at building effective and productive working relationships with staff and contractors. Excellent management, analytical, and organizational skills.

Responsible for disposal operations for LLRW and Mixed Waste Embankments, Containerized Waste Facility, and Large Components. Oversee operations for the Batch Plant, Shredder Facility, Rotary Dump Facility, Heavy Equipment Outside Support, and Water Management. Management liaison for the Safety Action Team.

Specific Duties

Promote a safe and compliant work environment, conduct safety and project meetings, prepare operating budgets, review and approve waste profiles for disposal, track direct material expenses, oversee disposal and construction activities, coordinated and allocate resources, handle conflict resolution

Specific Projects

Project/Construction Manager for the construction of the Rotary Dump Facility. This project included the construction of 6,000,000 BTU heater facility, 70 foot long rail car rotary dump facility, and rail car auto wash facility

Embankment Construction Manager for the LLRW Embankment Closure Project. This project included the construction of an eight foot thick clay cap with a three foot thick erosion barrier over an area of 745,800 square feet

Embankment Construction Manager for the construction of clay liner for the Class A and Class A North Embankments. This included the excavation and construction of a two foot thick clay liner over a 1,775,371 square foot area

AutoCAD Designer for the Annual Embankment As-Built Drawings. This included calculating waste volumes and remaining cell volumes using Land Desktop. The drawings and calculations are submitted to the State for compliance review and are used for determining annual surety requirements

Corrosion Control Technologies, Inc. Salt Lake City, Utah

1996 – 2004

Cathodic Protection Specialist

Project manager or project representative on numerous corrosion engineering projects for private, municipal, State, and Federal clients. Completed projects for Jordan Valley Water Conservancy District, Salt Lake City, Utah, Deseret Generation and Transmission, Vernal, Utah, City of Cedar City, Utah, Weber County School District, Ogden, Utah, Tesoro Refining and Marketing Company, Salt Lake City, Utah, Canadian River Municipal Water Authority, Sanford, Texas, and City of Vernal, Utah.

Specific tasks included generating proposals, preparing specifications, design and CAD drafting (Land Desktop), project management, construction management, coordination of project activities and scheduling, attended and conducted project meetings, documented project activities and preparation of reports. Assisted the client with bid services, pre-bid and pre-construction meetings, and was the client representative to maintain communication between the client and contractor.

Specific Projects

Project manager for the Jordan Valley Water Conservancy District's Jordan Aqueduct Reach 2 Phases I and II Cathodic Protection a 2 year project. This project was a two-phase project to add cathodic protection to an existing 15 mile, 78-inch diameter cement mortar coated steel potable water aqueduct within the Salt Lake Valley. Tasks included oversight of excavation, backfilling, drilling, and construction activities. Other tasks included reviewing well development and cathodic protection testing.

Project manager for Desert Generation and Transmission, a coal-fired power plant, on a four-phase plan, a 6 year project, to implement cathodic protection on the 20 mile, 30-inch pretensioned concrete cylinder raw water pipeline. The pipeline crosses oil fields and natural gas fields and has numerous pipeline crossings and cathodic protection systems that had to be evaluated as part of the design and energizing and testing work. The project work included oversight of construction activities, excavation, backfilling, drilling, providing quality control of activities, working with the contractor to complete electrical continuity repairs, deep anode grounded design, energizing and testing, and interference testing and mitigation design.

CH2M HILL, Salt Lake City, Utah

1990 – 1996

Engineering Technician

Worked with engineers in performing construction management services, project representative responsibilities, field testing and surveys, field sampling and analysis, and CAD drafting.

Specific Projects

Resident inspector for the Highland Dairy Reservoir and Pump house. This was an 8 month construction project of a new 2-million gallon concrete reservoir for Murray City, Utah. Responsibilities included inspection of all concrete, reinforcement, pile driving, earthwork, piping and providing oversight of the contractor's construction activities and quality control.

Resident inspector for the Weber Basin Centerville Pipeline, Centerville, Utah. This was a 6 month construction project of a new 5 mile long secondary water pipeline. This project included jacking and boring under Interstate 15, construction in wetland areas, residential streets, and Centerville foothills. Responsibilities included oversight of all construction activities, excavation, backfill, pipeline installation, quality control, density testing, and pressure testing of the pipeline.

Work Skills

Develop and Maintain Positive & Professional Relationships, Construction Management Experience, Understanding Construction Practices, Multitasking, CAD, Organized, Communication, Writing, Listening, Scheduling, Understand and Read Plans, Math, Budgeting, Problem Solving, Economics, Engineering, Coordination, Instructing, Negotiating, Decision Making, Reasoning

Computer Skills

Microsoft Office 2003
Microsoft Project
SureTrak Project Manager 3.0
AutoCAD Land Desktop 2005

Education

Associate of Applied Science, Computer Aided Drafting and Design
ITT Technical Institute Salt Lake City, Utah 1989 - 1990

Certifications (not current)

NACE International – Cathodic Protection Specialist (No. 5933)
NACE International – Corrosion Technologist
NACE International – Corrosion Technician