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Combustible Control Program	APPROVED BY:	Doug Buckle
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USE CATEG	GORY:	INFORMATION USE			Page 1 of 15
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$Level\ \underline{\textbf{2}}\ Administrative\ Procedure$

Revision	Record of Issue/Revision	Affected Pages
5	Revision/Periodic Review: update to current template and format; add Appendix A, <i>Regulatory Requirements Flow Down</i> , and associated Step in Purpose; incorporate findings from DOE Fire Protection Program audit, 2019.	All

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TITLE:

Combustible Control Program

REV. NO. 5

Page 2 of 15

CONTENTS

1.0	PUR	POSE	3
2.0	SCO	PE AND APPLICABILITY	3
3.0	GENERAL INFORMATION		
4.0	USE	REFERENCES	6
5.0	5.1	PONSIBILITIES Environmental, Safety, Health and Quality (ESH&Q)/Occupational Safety & Health &H)/Fire Protection (FP) Manager	
	5.2	FP Engineer	7
	5.3	Functional Area Manager (FAM)/Project Manager	7
	5.4	Project Lead	8
	5.5	Procurement Manager	8
	5.6	Work Control Manager	8
	5.7	Work Control Manager/Facility Custodian	8
	5.8	Facility Custodian/Task Leads	9
6.0	ACT 6.1	IONS Control of Combustibles Materials	
	6.2	Control of Ignition Sources.	11
7.0	REC	ORDS	11
8.0	DEF. 8.1	INITIONS/ACRONYMSDefinitions	
	8.2	Acronyms	13
9.0	SOU	RCE REFERENCES	13
Appe	ndix A	REGULATORY REQUIREMENTS FLOW DOWN	15

		FBP-FP-PRO-00005
TITLE: Combustible Control Program	Combustible Control Program	REV. NO. 5
	<u> </u>	Page 3 of 15

1.0 PURPOSE

- 1.1 This procedure has been developed to provide guidance to define the limits of combustibles that can be stored and moved through a facility on a temporary or permanent basis at Portsmouth Gaseous Diffusion Plant (PORTS).
- **1.2** This procedure has been developed to implement applicable requirements from the following:
 - FBP-FP-PDD-00001, Fire Protection Program Description
 - FBP-FP-PRO-00042, Fire Protection Engineering Building Surveys and Inspections
 - FBP-FP-PRO-00072, Welding, Burning, and Hot Work
 - FBP-OS-PRO-00041, *Housekeeping*
 - FBP-NO-PRO-00063, Combustible Material Control Requirements for Non-Former Uranium Enrichment Facilities (FUEF) Category 2 Facilities
 - FBP/PORTS-444, Documented Safety Analysis for the X-345 and, X-744G Facilities at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio
 - POEF-FBP-001, Basis for Interim Operations for Former Uranium Enrichment Facilities (FUEF) At the Portsmouth Gaseous Diffusion Plant, Piketon, OH
- **1.3** This document implements applicable regulatory requirements. They are listed in Appendix A, *Regulatory Requirements Flow Down*.

2.0 SCOPE AND APPLICABILITY

- 2.1 This Level 2 procedure applies to all facilities under Fluor-BWXT Portsmouth LLC (FBP) control, excluding office areas.
 - Office areas are covered by FBP-OS-PRO-00041, *Housekeeping*.
- 2.2 Housekeeping and good safe operating practices limit the levels of transient materials to the minimum practical levels and require all material be neatly and properly arranged to not only limit fire hazards but to also limit the damage and loss from a fire. Well-arranged storage of even large quantities is generally quite safe. When the storage becomes disorderly and intermixed with trash the hazard increases dramatically. Good housekeeping is a critical and the main factor in controlling the hazards due to the handling and control of transient combustibles throughout any facility.
- 2.3 The fundamental requirement of every storage arrangement is that it will not block egress paths, access to emergency equipment, or cause a safety hazard.
- 2.4 The combustibles not included by this program include (fixed) combustibles, considered part of the facility (e.g., wood platforms), and structured storage (e.g., material stored on fixed shelving such as Stores).

TITLE: Combustible Control Program		FBP-FP-PRO-00005
	Combustible Control Program	REV. NO. 5
	<u> </u>	Page 4 of 15

3.0 GENERAL INFORMATION

- **3.1** Operation and inspection clearance shall be maintained around fire-extinguishing and fire protection equipment.
- **3.2** Material storage shall not obstruct any part of a means of egress (including in stairwells and under stairways).
- 3.3 Clearance shall be maintained around the path of fire door travel to ensure the door's proper operation and inspection.
- **3.4** Aisles shall be maintained to retard the transfer of fire from one pile to another and to allow access for fire-fighting, salvage and removal of storage.
- 3.5 Dumpsters are not permitted within the facilities.
- **3.6** Waste containers (B25 boxes and larger) containing materials must be covered at the end of the shift.
- **3.7** Storage should always be kept to a minimum. Daily removal of debris and excess materials are essential to efficient and safe operations.
- **3.8** Storage configurations may include palletized storage, solid-piled storage, storage in bin boxes, on shelves, or on racks.
- **3.9** Combustible storage is limited to 12 feet storage height, (**Low-Piled Storage**) under in service sprinkler systems, the norm for PORTS.
- **3.10** Combustible storage in excess of 12 feet storage height, (**High-Piled Storage**) must be reviewed and approved by the Authority Having Jurisdiction (AHJ) and FBP Fire Protection.
- **3.11** Normal storage should be limited to storage spread across the floor to less than 4 feet with occasional stacks to 6 to 8 feet (average limit of one higher stack per column bay/400 sq. ft.). Aisles and travel paths must remain clear of materials.
- **3.12** Dry Active Waste (DAW) (disposable anti-C materials) in plastic drums (one high) is limited to a single column bay/400 sq. ft. with 10 foot spacing around the storage.
- 3.13 The limit for concentrated combustible storage is 2500 sq. ft. stored to 8 feet in height. Should the need arise for storage areas larger or higher, Fire Services (FS) or Fire Protection Engineering (FPE) must review and approve the request. Around the concentrated storage area there shall be a 20 foot clear space (aisle). There shall be at least a 3 foot space between the facility exterior wall and the storage.
 - In a process building: 2500 square feet is about 7 adjacent column bays as each are about 20 feet by 20 feet and concentrated storage areas are limited to 2 per building quarter.
 - In other buildings on site: concentrated storage areas are limited to 2 per building.

TITLE: Combustible Control Program	FBP-FP-PRO-00005	
	Combustible Control Program	REV. NO. 5
	Ū	Page 5 of 15

- **3.14** Combustible material shall not be stored in boiler rooms, mechanical rooms, or electrical equipment rooms. Materials and supplies for the operation and maintenance of the equipment in the room shall be permitted.
- **3.15** Transient combustible materials and spare filters shall not be stored in filter plenum enclosures.
- **3.16** Storage shall be maintained 2 feet (0.61 m) or more from the ceiling in non-sprinklered areas of buildings.
- **3.17** The clearance between the sprinkler head deflector and the top of storage shall be 18 inches (457 mm) or greater.
- **3.18** Clearance shall be maintained to lights and light fixtures to prevent ignition.
- **3.19** Storage clearance from ducts shall be maintained in accordance with National Fire Protection Association (NFPA) 91, Standard for Exhaust Systems for Air Conveying of Vapors, Gases, Mists and Particulate Solids.
- **3.20** The clearance between stored materials and unit heaters, radiant space heaters, duct furnaces and flues shall be not less than 3 feet (0.9 m) in all directions or shall be in accordance with the clearances shown on the approval agency label.
- **3.21** Idle pallet storage in a faculty represents a special hazard. A fire in idle plastic or wooden pallets is one of the greatest challenges to sprinklers. General storage should be outside with pallet stacks (50 or less) at least 20 feet, from the building. Stacks greater than 50 in number shall be 50 feet from any structure.
- **3.22** Wood pallet storage inside sprinkler protected facilities is limited to 4 stacks 4 feet high in 400 square foot area with at least 10 foot separation for ceiling heights to 25 feet. If the ceiling height is over 25 feet then the storage is limited to 2 stacks 4 feet high within a 400 sq. ft. area.
- 3.23 Inside storage of plastic pallets, in sprinkler protected facilities, is limited to two stacks no higher than 4 feet in 400 square foot area which must be separated from other plastic pallet stacks by a minimum of 10 feet and 30 feet from other combustible storage.
- **3.24** Idle pallets shall not be stored on racks, shelves or above doors.
- 3.25 In a building with an approved Transitional Fire Hazard Analysis (TFHA), the limit of combustible storage areas is 2500 square feet, stored to 12 feet in height <u>under in-service sprinkler systems</u>. Around the storage area there shall be a 20 foot clear space (aisle). There shall be at least a 3 foot space between the facility exterior wall and the storage. Should the need arise for additional storage areas, FS or FPE must review and the AHJ approve the request.
- **3.26** Flammable liquids and combustible liquids will be stored and handled in accordance with FBP-FP-PRO-00071, *Flammable and Combustible Liquids*.

TITLE: Combustible Control Program		FBP-FP-PRO-00005
	Combustible Control Program	REV. NO. 5
	Page 6 of 15	

- **3.27** X-345 is a special non-sprinklered facility. Combustible levels in this facility will be established by the Facility Manager and FPE and approved by the site AHJ.
- **3.28** X-710 is a special partially sprinklered Laboratory Facility. Levels of combustible materials will be established by the Facility Custodian and FPE and approved by the site AHJ (as part of the building survey, Fire Hazard Analysis (FHA), or other documentation).
- **3.29** Combustible storage in non-sprinklered facilities will be established by the Facility Custodian, FPE and approved by the site AHJ. (As part of the building survey, FHA, or other documentation.)
- **3.30** Temporary Enclosures shall only use noncombustible panels, flame-resistant tarpaulins, or approved materials of equivalent fire-retardant characteristics.
- **3.31** Miscellaneous indoor rubber tire storage shall be in one of the following acceptable criteria: the storage of tires that is incidental to the main use of the building;
 - The storage areas shall not exceed 2,000 ft².
 - On-tread storage piles, regardless of storage method, shall not exceed 25 feet in the direction of the wheel holes.
 - Acceptable storage arrangements include
 - (a) On-floor, on-side storage up to 12 feet high
 - **(b)** On-floor, on-tread storage up to 5 feet high
 - (c) Double-row or multi-row fixed or portable rack storage on-side or on-tread up to 5 feet high
 - (d) Single row fixed or portable rack storage on-side or on-tread up to 12 feet high
 - (e) Laced tires in racks up to 5 feet in height

The clearance from the top of storage to sprinkler deflectors shall be not less than 36 inches (900mm) where rubber tires are stored. These storage arrangements must be reviewed and approved by the AHJ or designee.

4.0 USE REFERENCES

- **A.** FBP-FP-PDD-00001, Fire Protection Program Description
- **B.** FBP-FP-PRO-00071, Flammable and Combustible Liquids
- C. FBP-FP-PRO-00072, Welding, Burning, and Hot Work
- **D.** FBP-HR-POL-00056, Smoking Policy

		FBP-FP-PRO-00005
TITLE: Combustible Control Program	Combustible Control Program	REV. NO. 5
	Ü	Page 7 of 15

E. FBP-OS-PRO-00034, Storing, Handling, and Using Compressed Gases

5.0 RESPONSIBILITIES

- 5.1 Environmental, Safety, Health and Quality (ESH&Q)/Occupational Safety & Health (OS&H)/Fire Protection (FP) Manager
 - **5.1.1** Assigns FP Program responsibilities, including the implementation, and maintenance of the FBP Combustibles Control Program, to the appropriate Supervisor.
 - **5.1.2** Ensures adequate resources are provided to implement the FBP Combustible Control Program through deployment of personnel to FBP Projects.
 - **5.1.3** Provides company level support to project teams for the oversight and assessment of the FBP Combustible Control Program.
 - **5.1.4** Ensures consistent implementation of the FP Functional Area Program requirements, including the control of combustibles and ignition sources through the development and maintenance of company-wide procedures, policies, and programs.
 - **5.1.5** Ensures a required reading of the Combustible Control Program is developed and implemented by the FBP training organization, according to standards and requirements.
 - **5.1.6** Supports the project manager for FP policy and combustibles control matters.

5.2 FP Engineer

- **5.2.1** Maintains knowledge of regulatory requirements regarding combustible storage controls.
- **5.2.2** Supports continuous improvement in the FBP Combustibles Control Program.
- **5.2.3** Ensures combustible controls, for project executed work (self-performed or subcontracted), are in compliance with this procedure.
- **5.2.4** Reviews requests for procured materials and storage of materials, as necessary.

5.3 Functional Area Manager (FAM)/Project Manager

Ensures the control of combustibles and ignition sources by complying with requirements contained in this procedure as well as requirements contained in facility specific FHAs or other fire protection assessment documents (such as a Building Survey). This can be done by implementing this procedure directly or by implementing project or facility level specific combustible controls in work packages that reflect the requirements and guidelines contained in this procedure.

TITLE: Combustible Control Program	FBP-FP-PRO-00005	
	Combustible Control Program	REV. NO. 5
	Page 8 of 15	

5.4 Project Lead

- **5.4.1** Plans and conducts all work in a manner that minimizes the total quantity of combustible material at a facility.
- **5.4.2** Ensures removal of unnecessary combustible materials from the facility in a timely manner or places in approved non-combustible containers.
- **5.4.3** Ensures new storage configurations of combustible or flammable materials has had a FPE evaluation performed by a qualified FPE.
- **5.4.4** Ensures flammable and combustible liquids are used, handled, and stored in accordance with the requirements of FBP-FP-PRO-00071, *Flammable and Combustible Liquids*.
- **5.4.5** Ensures flammable and compressed gases are used, handled, and stored in accordance with FBP-OS-PRO-00034, *Storing, Handling, and Using Compressed Gases*.

5.5 Procurement Manager

Ensures appropriate FP requirements are flowed down to subcontractors.

5.6 Work Control Manager

- **5.6.1** Ensures appropriate FP requirements are included in work control packages. This includes but is not limited to:
 - **A.** Including specific work control instructions in work packages to minimize the accumulation of transient combustibles at the job-site.
 - **B.** Requiring removal of all unnecessary combustible material at the job site at the end of each work shift and prior to completion of the work package.
 - C. Limit transient combustibles to those materials and quantities necessary to support work activities and place all secondary waste, scrap, rags, or other combustible materials resulting from work activities in approved non-combustible waste containers or dry active waste containers, as appropriate.
- **5.6.2** Ensures the work control package includes requirements for temporary construction, demolition, and renovating activities.
- **5.6.3** Ensures hazards related to flammables and combustibles are identified and stated in the Job Hazard Analysis (JHA), and the work package.

5.7 Work Control Manager/Facility Custodian

Ensures limitations as provided in the JHA, Preliminary Hazard Screening (PHS), Work Packages, and this procedure, are not exceeded.

		FBP-FP-PRO-00005
TITLE: Combustible Control Program	Combustible Control Program	REV. NO. 5
		Page 9 of 15

5.8 Facility Custodian/Task Leads

Maintains effective housekeeping practices in accordance with this procedure by:

- Controlling the amount of any combustible waste material to prevent the accumulation in any area or in any manner that creates a fire hazard to life or property.
- Controlling combustible waste or refuse by properly storing it or disposing of it to prevent unsafe conditions.

TITLE:		Combustible Control Program	FBP-FP-PRO-00005
	TITLE:		REV. NO. 5
			Page 10 of 15

6.0 ACTIONS

6.1 Control of Combustibles Materials

Functional Area Manager or Designee/Project Lead or Designee

- **6.1.1** Control the quantity and handling of combustibles in and around the facility in accordance with this procedure and FPE directions, as listed in Section 3.0.
- **6.1.2** Do not allow storage of combustible materials in the following locations:
 - **A.** Above suspended ceilings or below raised floors
 - **B.** Under glove boxes or other process equipment
 - **C.** Under stairs and/or in stairwells
 - **D.** Within 35 feet of a fixed weld shop
 - **E.** Within 10 feet of acids and oxidizers
- **6.1.3** Ensure all waste, scrap, rags, trash, and other combustible material resulting from work activity is disposed of in approved non-combustible waste receptacles, or removed from the building at the end of each work shift.
- 6.1.4 Ensure materials susceptible to spontaneous ignition, such as oily rags, paint thinner soiled rags, etc., are stored in an Underwriters Laboratory (UL)-listed storage container.
- 6.1.5 Ensure unnecessary combustible materials are kept away from air handling ducts and High Efficiency Particulate Air (HEPA) filter enclosures and rooms.
- **6.1.6** Ensure accumulation and storage of combustible materials is **not** permitted in mechanical rooms, electrical rooms, telephone equipment rooms, generator rooms, battery charging areas and rooms, fixed weld shops, or laboratories.
- 6.1.7 Ensure all small appliances have been approved by FBP FPE and/or the Safety & Industrial Hygiene (S&IH) group prior to purchasing.
- 6.1.8 Ensure electrical appliances and equipment are UL-listed and/or Factory Mutual (FM)-approved, and used in accordance with manufacturers' instructions, especially regarding spacing from combustibles and flammable materials.
- **6.1.9** Ensure access to fire suppression systems, emergency response equipment, and emergency exit paths from facilities are maintained clear and unobstructed at all times.
- **6.1.10** Require the use of non-combustible containers for disposing of combustible trash. Do not use wood, paper or cardboard boxes, plastic barrels, or containers except as approved by the FPE or AHJ.

		FBP-FP-PRO-00005
TITLE:	Combustible Control Program	REV. NO. 5
		Page 11 of 15

- **6.1.11** Ensure waste receptacles are emptied in a timely manner and/or when approximately ³/₄ full.
- **6.1.12** Ensure work involving construction, demolition, or renovating activities conforms to:
 - **A.** Noncombustible or fire-retardant scaffolds, formwork, decking, and partitions shall be used both inside and outside of permanent buildings where a fire could cause substantial damage.
 - **B.** Tarpaulins (fabrics) and plastic films shall be certified to conform to the weather-resistant and fire-retardant materials per NFPA 701, *Standard for Methods of Fire Tests for Flame Propagation of Textiles and Films*
 - C. All combustible waste is to either be removed from the building or stored in closed metal containers at the end of each work shift.
 - **D.** Good housekeeping is maintained at all times.
 - **E.** General requirements located in this procedure.

6.2 Control of Ignition Sources

Facility Custodians/Task Leads

- 6.2.1 Control and minimize ignition sources within a facility. Ignition sources include open flame devices, spark-producing devices, glowing embers, hot surfaces (e.g., ovens, furnaces, combustion engine exhaust, heat guns, and heating resulting from friction), smoking, welding, grinding, and static electricity. Exposed electrical arcing is an ignition source as well as a safety hazard.
- **6.2.2** Comply with FBP-HR-POL-00056, *Smoking Policy*, by prohibiting smoking inside buildings, radioactive material areas, radiological areas, or in areas where toxic or flammable materials are stored or used.
- 6.2.3 Comply with "hot work" requirements in FBP-FP-PRO-00072, *Welding, Burning, and Hot Work*, for all work activities involving burning, welding, grinding or other hot work operations.

7.0 RECORDS

None

8.0 DEFINITIONS/ACRONYMS

8.1 Definitions

A. Approved – Specifically designated as acceptable by the Fire Protection Engineer or, in the case of equipment or containers, by a testing agency such as UL or Factory Mutual.

	•	FBP-FP-PRO-00005
TITLE:		REV. NO. 5
	Page 12 of 15	

- **B.** Authority Having Jurisdiction (AHJ) The decision making authority in matters concerning FP. A qualified individual responsible for contractor level decisions of a routine nature regarding acceptable levels of FP within literal conformance with contractual FP requirements. In addition, the AHJ also prepares requests for equivalencies and exemptions that are submitted to Department of Energy (DOE) for ultimate resolution on non-routine issues of conformance. This is a delegated responsibility with DOE performing as the ultimate AHJ for FP matters
- C. Building Survey A fire protection facility assessment that identities significant fire and life safety deficiencies that would prevent achievement of DOE's fire safety policy objectives. Surveys are typically performed more frequently than FHAs to meet a schedule negotiated with DOE.
- **D.** Combustibles Any material that, in the form in which it will be used, will ignite and burn; support combustion; or, release flammable vapors when subjected to heat or flame. The term combustible does not indicate ease of ignition, burning intensity, or rate of burning.
- E. Ensure To confirm, substantiate and assure that an activity or condition has been implemented in conformance with the specified requirements. Allows for manipulation of equipment or instrumentation to conform to specified requirements. May be done by methods other than direct observation.
- **F. Fire Hazards Analysis (FHA)** A comprehensive and qualitative assessment of the risk from fire and an evaluation of compliance with DOE fire safety requirements within individual fire areas in DOE facilities.
- G. Fire Protection (FP) A broad term which encompasses all aspects of fire safety, including: building construction and fixed building fire features, fire suppression and detection systems, fire water systems, emergency process safety control systems, emergency firefighting organizations (fire departments, fire brigades, etc.), FP engineering, and fire prevention. FP is concerned with preventing or minimizing the direct and indirect consequences of fire. It also includes aspects of the following perils as they relate to FP: explosions; natural phenomenon; smoke and water damage from fire.
- H. Fire Protection Engineer (Qualified FP Engineer) A graduate of an accredited engineering curriculum having completed not less than four years of engineering practice, three of which shall have been in responsible charge of diverse FP engineering work. If not such a graduate, a qualified engineer shall, either:
 - Demonstrate knowledge of the principles of engineering and have completed not less than six years engineering practice, three of which shall have been in responsible charge of diverse FP engineering projects.
 - Be a registered professional engineer in FP or meet the requirements for member grade Society of Fire Protection Engineers.

		FBP-FP-PRO-00005
TITLE:	Compustible Control Program	REV. NO. 5
		Page 13 of 15

- I. High-Piled Storage Solid-piled, palletized, rack storage, bin box, and shelf storage in excess of 12 ft. in height, is permitted in any facility with automatic fire suppression, subject to approval by the AHJ or designee. To use any building or portion thereof as a high-piled storage area exceeding 400 ft², AHJ approval is required.
- J. Idle Pallets Empty wood pallets or plastic pallets with slatted (not solid) construction.
- **K.** Low-Piled Storage Solid-piled, palletized, rack storage, bin box, and shelf storage up to 12 ft. in height, is permitted in any facility with automatic fire suppression.
- L. Shall Denotes a requirement.
- M. Transient Combustibles Combustibles that are not permanently installed in the facility; whose storage and use are temporary, or incidental, to the primary functions and activities of the area, and are not located in a permanently designed storage area. (Examples of transient combustibles are wood, plastics, oil, etc.)

8.2 Acronyms

- **A. AHJ** Authority Having Jurisdiction
- **B. FHA** Fire Hazard Analysis
- \mathbf{C} . \mathbf{FP} Fire Protection
- **D. FPE** Fire Protection Engineer
- E. UL Underwriters Laboratory

9.0 SOURCE REFERENCES

- **A.** 10 CFR 830, Nuclear Safety Management Subpart B, Safety Basis Requirements
- **B.** 10 CFR 851, Worker Safety and Health Program
- C. 29 CFR 1910, Occupational Safety and Health Standards
- **D.** 29 CFR 1926, Safety and Health Regulations for Construction
- E. DOE O 420.1CB, Facility Safety
- **F.** DOE-STD-1066-2016, Fire Protection
- **G.** FBP/PORTS-444, *Documented Safety Analysis for the X-345 and X-744G Facilities at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*
- **H.** FBP-FP-PDD-00001, Fire Protection Program Description

	Combustible Control Program	FBP-FP-PRO-00005
TITLE:		REV. NO. 5
	Ü	Page 14 of 15

- **I.** FBP-OS-PRO-00041, Housekeeping
- J. National Fire Protection Association Handbooks, Guides and Recommended Practices
- **K.** NFPA 1, Fire Prevention Code
- L. NFPA 241, Standard for Safeguarding Construction, Alteration, and Demolition Operations
- M. NFPA 30, Flammable and Combustible Liquids Code
- N. NFPA 55, Compressed Gases and Cryogenic Fluids
- **O.** NFPA 70, National Electrical Code®
- **P.** NFPA 701, Standard for Methods of Fire Tests for Flame Propagation of Textiles and Films
- **Q.** NFPA 70E, National Electric Safety Code
- **R.** NFPA 801, Standard for Fire Protection for Facilities Handling Radioactive Materials
- S. POEF-FBP-001, Basis for Interim Operation for Former Uranium Enrichment Facilities (FUEF) At the Portsmouth Gaseous Diffusion Plant, Piketon, OH

		FBP-FP-PRO-00005
TITLE:		REV. NO. 5
, and the second	Page 15 of 15	

Appendix A REGULATORY REQUIREMENTS FLOW DOWN

- 1. 10 CFR 851, Worker Safety and Health Program
- 2. 29 CFR 1910, Occupational Safety and Health Standards
- 3. 29 CFR 1926, Safety and Health Regulations for Construction
- 4. DOE Order 420.1C, Facility Safety
- 5. DOE Standard 1066-2016, Fire Protection
- **6.** NFPA 1, Fire Prevention Code
- 7. NFPA 241, Standard for Safeguarding Construction, Alteration, and Demolition Operations
- 8. NFPA 701, Standard for Methods of Fire Tests for Flame Propagation of Textiles and Films
- 9. NFPA 801, Standard for Fire Protection for Facilities Handling Radioactive Materials