March 10, 2022
ES&H-2022-005

Mr. Peter D. Rodrik
Manager
U.S. Department of Energy
National Nuclear Security Administration
Livermore Field Office
P.O. Box 808, L-293
Livermore, CA 94551

Subject: Lawrence Livermore National Security, LLC (LLNS) *Request for Variance From 10 CFR 851 for Construction of the Lawrence Livermore National Laboratory (LLNL) Digital Infrastructure Capabilities Expansion*

Dear Mr. Rodrik:

Lawrence Livermore National Security, LLC (LLNS) requests variance from Title 10, Code of Federal Regulations 851 (10 CFR 851) Subpart B, Subpart C, and Appendix A for the Digital Infrastructure Capabilities Expansion construction project. This request is submitted as a follow on to the pilot program launched by NA-50. As required by 10 CFR 851.31(d)(2), we have included a revision of the documentation used previously to demonstrate how compliance with Cal/OSHA requirements for the project would provide workers a place of employment which is as safe and healthful as would result from compliance with the requirements of 10 CFR 851.

As with the Emergency Operations Center construction project, the Injury and Illness Prevention Program (IIPP) will incorporate Cal/OSHA regulations, Federal OSHA construction standards as necessary, and portions of 10 CFR 851 where its requirements are not adequately addressed by Cal/OSHA requirements.

If this request is approved, LLNS will work closely with Livermore Field Office (LFO) staff to implement the provisions of the variance.

If you have comments or need additional information, our primary contact is Clay Davis at 925-409-7933, and our secondary contact is Charles Strong at 925-424-6483.

Sincerely,

Woodrow, Lisa M.
Digitally signed by Woodrow, Lisa M.
Date: 2022.03.10 09:50:52 -08'00'

Lisa Woodrow
Associate Director
Environment, Safety & Health

Enclosure: LLNS Request for Variance from 10 CFR 851 for Construction of LLNL Digital Infrastructure Capabilities Expansion Project

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