

Standards Actions

Technical Standards Program Newsletter

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NUCLEAR SAFETY

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Publishing Organization

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TECHNICAL STANDARDS ACTIVITIES

IMPROVEMENTS IN THE PROJECT JUSTIFICATION STATEMENT PROCESS

The Department of Energy (DOE) Technical Standards Program (TSP) has two important roles. First, it is responsible for adherence to the Office of Management and Budget (OMB) Circular A-119, *"Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities."* OMB Circular A-119 establishes policies to improve the internal management of the Executive Branch with respect to the U.S. Government's role in the development and use of standards and conformity assessment. Second, the TSP provides the infrastructure for developing, coordinating, approving, and maintaining DOE-developed technical standards for use in the design, construction, operation, and decommissioning of DOE facilities.

So, how did the TSP come to be? Historically speaking, the TSP resulted from the Implementation Plans (IP) for two Defense Nuclear Facilities Safety Board (DNFSB) Recommendations: DNFSB 90-2 and DNFSB 91-1. The IP for DNFSB 90-2 addressed the identification of applicable standards for the design, construction, operation, and decommissioning of defense nuclear facilities, and focused on Savannah River Site, Rocky Flats Plant, Hanford Site, and the Waste Isolation Pilot Plant. The IP for DNFSB 90-2 also addressed the adequacy of those standards for protecting public health and safety. The IP for DNFSB 91-1 addressed the overall approach to developing and implementing standards throughout the DOE complex, and for re-examining the existing infrastructure for standards development and implementation to determine necessary changes.

By law, DOE should be using non-Governmental Voluntary Consensus Standards (VCS) in lieu of developing or revising DOE Technical Standards. Therefore, it was prudent that there be a substantial justification process in place to determine if the development or the revision of a DOE Technical Standard was warranted. The TSP justification process is embodied in a template called a Project Justification Statement (PJS). Recently, the TSP improved all of its processes and, as such, strengthened the PJS template.

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In sequence, the following attributes are to be included prior to a PJS being considered for concurrence review.

1. **PJS Title:** The PJS must be properly titled, preferably with the expected technical standard title.
2. **Originating Organization Name/Code:** Self-explanatory (e.g., The Office of Nuclear Safety/AU-30).
3. **Author's Name and Signature:** Name, signature, phone number, and email must be included.
4. **Senior Line Manager's Name and Signature:** Name, signature, phone number, and email must be included.
5. **Standard Benefit to DOE:** This section should include details about why this standard or the revision of an existing standard benefits DOE. For example, the standard or revision is part of an Implementation Plan for Defense Board Recommendations, or it's part of an organization's fiscal year strategic plan.
6. **Search for Existing VCSs:** This section should include details about the searches performed for existing VCSs that could be used in lieu of developing or revising a DOE Technical Standard. Include information about methods or sources used to acquire search results, such as Google, IHS database, or National Institute of Standards and Technology (NIST) database, etc.
7. **Reasons for Not Using Existing VCSs:** If the search for existing VCSs resulted in VCSs that can be used in lieu of developing or revising DOE Technical Standards, but the Preparing Activity elects to not use them, then use this section for a detailed justification.
8. **Directives Program (DP) Impact:** This section should include details about whether the DOE Technical Standard is to be invoked in an Order(s) or other DP requirement documents.
9. **DNFSB Interest:** This section should include details about any DNFSB interest.
10. **Provide Reasoning for Selecting Document Types (DOE Standard, DOE Handbook, DOE Specification):** Refer to DOE Order 252.1A, *Technical Standards Program*, Appendix A.
11. **Process Milestones:** This section should include the anticipated timeline for the development and coordination process.
 - Planned start date for draft standard development
 - Planned date for draft standard to start coordination (60-Day Review & Comment)
 - Planned approval and issuance date

Note that by providing as much detail as possible on each of the above numbered PJS items, the technical standard writer will help to ensure a smooth PJS concurrence process and the subsequent coordination of the draft standard being developed or revised. The current version of the PJS template is located here:

<https://www.standards.doe.gov/technical-standards-tools/project-justification-statement>

If you have any questions regarding the PJS or the Technical Standards Program, please contact Jeff Feit, Manager, DOE Technical Standards Program, at 301-903-0471 or email at jeffrey.feit@hq.doe.gov.

TECHNICAL STANDARDS PROGRAM REVCOM UPGRADES

The Technical Standards Program (TSP) RevCom is the web-based application the DOE Technical Standards Program uses for the coordination of draft DOE Technical Standards documents. User feedback often provides the impetus for upgrading the application, making it continually successful. Below is an overview of recent TSP RevCom upgrades to Comment Entry and Comment Disposition functions. In addition, the reporting functionality has been upgraded to provide more detail. For more information, click *Help* in RevCom.

Commenting

The comment window label was changed to ask, "What is the issue?" When the reviewer (subject matter expert (SME)/Technical Standards Manager (TSM)/Delegate) selects *Essential* as a comment type, RevCom will display an additional window where the reviewer can enter a "proposed solution and/or changes to the document." This optional function allows for better communication with the Preparing Activity (PA) and can be activated when the document is posted to RevCom or later when the document is in review.

Excluding Comments

A TSM/Delegate can now choose to *Exclude* a comment. For an essential comment, the TSM/Delegate must enter justification in the pop-up window that is provided. Some examples of justification for excluding a comment are: duplication, nonrelevant to the topic, or not representing the organization's position. The TSM/Delegate can reconsider the exclusion, and opt to include the comment in the package submission.

Comment Disposition

Reviewers can now see more detail of how their comments were addressed using the Comment Disposition Report that is available after the TSM has submitted the package. The PA's response to comments will be included in the Comment Disposition Report following submission of the Response Package. Comment Disposition is available through the *Reports* menu. Select *Quick*, then choose *Comment Disposition*. The report will show the reviewer's submission as it progressed through the system and will include the PA's response when it has been submitted.

Custom Reports

For custom reports, reviewers can choose to deliver comments and responses (when submitted) as a screenshot, in an Excel spreadsheet, in a Word Table, or as a PDF for the convenience of non-RevCom users. For example, reports distributed to managers who do not use RevCom can be produced in PDF.

Question Response Reports

Reports on responses to Project Justification Statements (PJS), Concurrence, Reaffirmation, and Cancellation questions have been broadened to include an Answers Table that displays Headquarters organizations' responses that can be expanded to include responses from suborganizations. The Questions/Answers Graphics report displays question responses in pie charts.

Threaded Discussion

During a review, users can address or introduce issues in a discussion forum that allows an open exchange within an organization. These threaded exchanges are confined to the discussion forum and will not be part of any comments that the user might submit. Discussion threads and comments within a thread are sorted by date in chronological order. A link to *Discussion* is available on the *Document List* page below the document title. Users may add a new topic or continue an existing discussion.

If you have questions or need assistance, please contact Technical Support.

email: support@doxcelerate.com

phone: 505-663-1302

TECHNICAL STANDARDS ACTIVITIES

DOE TECHNICAL STANDARDS UPDATES

The following is an overview of recent Technical Standards actions. A complete list of on-going DOE Technical Standards actions can be found on the "Monthly Status Reports" posted on the Technical Standards Program website: www.standards.doe.gov.

Project Justification Statements Posted in RevCom for 15-Day Review

Proposed New Document

DOE-HDBK-XXXX-YR, *Operations Security Program Handbook*

Point of Contact (POC): Linda Ruhnow, Office of Security Policy (AU-51) Phone: 301-903-2661

Proposed Revision

DOE-STD-1196-2011, *Derived Concentration Technical Standard*

POC: Carlos Corredor, Office of Public Radiation Protection (AU-22) Phone: 201-586-0471

New Projects Registered

Proposed New Documents

DOE-HDBK-XXXX-YR, *DOE Facility Security Clearance and Foreign Ownership, Control, or Influence Handbook*

POC: Natasha Wright, Office of Security Policy (AU-51) Phone: 301-903-4804

DOE-STD-XXXX-YR, *Emergency Management Program Administration; Risk-Informed and Performance-Based Indicators and Assessments*

POC: Jose Barrios, Office of Preparedness/Training (NA-40) Phone: 202-586-9748

DOE-STD-XXXX-YR, *Preparation of Safety Analysis for Hazard Category 3 Nuclear Facilities*

POC: Caroline Garzon, Office of Nuclear Safety Basis and Facility Design (AU-31) Phone: 301-903-8272

Proposed Revisions

DOE-STD-1171-2009, *Safeguards and Security Functional Area Qualification Standard*

POC: Michael Greene, National Training Center (EA-50) Phone: 505-845-6359

DOE-STD-1112-2016, *DOE Laboratory Accreditation Program for Radiobioassay*

POC: James Dillard, Office of Worker Safety and Health Policy (AU-11) Phone: 301-903-1165

DOE-HDBK-1092-2013, *Electrical Safety*

POC: Moriah Ferullo, Office of Worker Screening and Compensation Support (AU-14) Phone: 301-903-0881

DOE-STD-1153-2002, *A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota*

POC: Katharine McClellan, Office of Environmental Protection and ES&H Reporting (AU-20) Phone: 202-586-0183

DOE-STD-3010-1994, *Airborne Release Fractions/Rates and Respirable Fractions for Nonreactor Nuclear Facilities*

POC: Caroline Garzon, Office of Nuclear Safety Basis and Facility Design (AU-31) Phone: 301-903-8272

DOE-STD-1217-2016, *DOE S & S Survey and Self-Assessment Planning*

POC: Gary White, Office of Security Policy (AU-51) Phone: 301-903-4976

Posted in RevCom for 60-Day Review

Proposed Cancellation

DOE-STD-3028-2000, *Criteria for Packaging and Storage Uranium-233-Bearing Materials*

POC: Carl Sykes, National Nuclear Safety Administration (NNSA) Phone: 301-903-0429

Proposed Reaffirmation

DOE-STD-1207-2012, *Change Notice 1, Protection Program Defensive Planning for Fixed Facilities*

POC: Richard Faiver, Office of Security Policy (AU-51) Phone: 301-903-4613

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Proposed Revisions

DOE-STD-3013, 2012, *Stabilization, Packaging, and Storage of Plutonium-Bearing Material*

POC: Maxcine Maxted, Savannah River Site Phone: 803-208-0506

DOE-STD-1151-2010, *Facility Representative Functional Area Qualification Standard*

POC: James Heffner, Office of Quality Assurance and Nuclear Safety Management Programs (AU-32)

Phone: 202-586-3690

DOE-STD-1095-2011, *Department of Energy Laboratory Accreditation Program for External Dosimetry*

POC: James Dillard, Office of Worker Safety and Health Policy (AU-11) Phone: 301-903-1165

Posted in RevCom for 30-Day Review**Proposed Reaffirmation**

DOE-HDBK-1214-2014, *Conduct of Operations Assessment Field Handbook*

POC: Earl Hughes, Office of Quality Assurance and Nuclear Safety Management Programs (AU-32)

Phone: 202-586-0065

Cancellations

DOE-STD-1157-2002, *Environmental Restoration Functional Area Qualification Standard*

DOE-STD-1166-2003, *Deactivation and Decommissioning Functional Area Qualification Standard*

DOE-STD-1178-2004, *Technical Program Manager Functional Area Qualification Standard*

POC: Al MacDougall, National Training Center (EA-50) Phone: 505-845-5549

UPCOMING MEETINGS & CONFERENCES

Energy Facility Contractors Group (EFCOG)**Nuclear Facility Safety Workshop**

When: August 11–17, 2018

Where: Richland, WA

EFCOG Integrated Safety Management & Quality**Assurance Working Group Meeting Fall 2018**

When: October 15–18, 2018

Where: Richland, WA

2018 American Nuclear Society Winter Meeting**and Nuclear Technology Expo**

When: November 11–15, 2018

Where: Orlando, FL

To learn more about the DOE Technical Standards Program
or to view the *Standards Actions* newsletters,
visit the website:

www.standards.doe.gov