



## Department of Energy

Washington, DC 20585

January 3, 2008

MEMORANDUM FOR INGRID KOLB

DIRECTOR

OFFICE OF MANAGEMENT

THROUGH:

KEVIN HAGERTY

DIRECTOR

OFFICE OF INFORMATION RESOURCES

FROM:

GLENN S. PODONSKY

CHIEF HEALTH, SAFETY, AND SECURITY OFFICER

OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT:

Notice of Intent to Revise DOE Manual 470.4-6, chg 1,  
Nuclear Material Control and Accountability

PURPOSE:

The purpose of this revision is to remove unnecessary requirements, provide a performance-based set of material control and accountability (MC&A) requirements that can be more easily tailored to individual facilities, and advance MC&A policy toward the Secretary's goals set forth in his recent memorandum, dated September 10, 2007, subject: Principles Governing Departmental Directives, on Department of Energy (DOE) policy development. In order to accomplish this purpose, a requirement-by-requirement review of current MC&A policy was performed to determine the need for the requirement, whether the requirement is redundant with other requirements in DOE or national policy documents, and whether the requirement is effective as worded or whether it could be made clearer or more performance-based. The resulting manual will provide a significant advance toward the stated purpose.

JUSTIFICATION:

This revised manual eliminates a number of unnecessary or overly prescriptive requirements, establishes a more performance-based approach for implementing MC&A requirements, and is designed to allow MC&A programs to be more easily tailored to operational conditions and programmatic objectives. Publication of the revised manual will increase the efficiency with which MC&A programs are implemented at DOE facilities.



This directive is not included in the routine review and certification of our directives. Accordingly, a proposed development schedule is attached.

The proposed directive does not duplicate existing laws, regulations, or national standards, and it does not create undue burden on the Department.

**IMPACT:**

The requirements review was performed by a mixed team of topical experts representing DOE Headquarters and the field. Their goal was to identify the minimum requirement set required to provide adequate assurance that an MC&A program was established and maintained. To assess the impact of the resulting requirements, the draft directive was subjected to a red team review by three field sites selected in consultation with their respective program offices. Each red team member was asked to evaluate the draft manual as if it had arrived for implementation and to assess the impact of its implementation at their site. Each of the red team members had certain concerns, which were resolved, between the red team and the topical working group, with the result that the red team members concluded that the cost and operational impact of implementing the revised manual will be less than, or at most the same as, the cost and impact of the current MC&A requirements.

**CONTACT:**

The point of contact for this revision is Jim Crabtree, Office of Policy, at (301) 903-6008.

**DECISION:**

Concur: \_\_\_\_\_  
 Non-concur: \_\_\_\_\_  
 Timeframe:     30 days     60 days   X   90 days     120 days  
 Date: \_\_\_\_\_

**Attachment**

**Implementation Schedule:** The Revision of DOE Manual 470.4-6, Chg 1, will be processed under Track 3-90 calendar days pursuant to DOE M 251.1B, Chapter III for issuance.

<b>Milestone</b>	<b>Planned</b>	<b>Completed</b>
Meet with MC&A Policy Review Team and review DOE M 470.4-6, chg 1	2/07	2/07
Create draft policy document	2/07	5/07
Submit draft to MC&A Red Team	5/07	5/07
Receive and resolve PF Red Team comments (with PF Review Team)	6/07	8/07
Prepare final Draft of DOE M 470.4-6A	9/07	12/07
Obtain comments from HSS program offices and concurrently submit to internal (PNNL) technical editor	12/07	
Submit Justification Memorandum to MA-44	12/07	12/07
Resolve internal comments and produce revised draft	1/07	
Submit draft MC&A Manual to MA-1 for review, editing, and approval	2/08	
Post to RevCom	2/08	
Resolve RevCom comments and final approval	4/08	
Target Approval Date	5/08	