



Department of Energy
Washington, DC 20585

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Jim. CHERON - REVISION
RECD MA-90 - 7/24
OUT FOR REVIEW - 7/30
DRB DISCUSSION - 8/13

MEMORANDUM FOR INGRID A.C. KOLB
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THROUGH: KEVIN T. HAGERTY
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FROM: GLENN S. PODONSKY
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SUBJECT: Revision of Department of Energy Order 433.1A,
*Maintenance Management Program for DOE Nuclear
Facilities*

PURPOSE:

This memorandum provides justification for a proposed revision to Department of Energy (DOE) Order (O) 433.1A, *Maintenance Management Program for DOE Nuclear Facilities*, to be submitted for DOE-wide review in RevCom.

JUSTIFICATION:

Summary of Revised Order and Development Process. The proposed revision to the Order clarifies and refines DOE and contractor requirements and makes clear the relationship of the Order to its overarching nuclear safety regulation, 10 Code of Federal Regulations (CFR) 830, *Nuclear Safety Management*. The proposed revision was developed in accordance with the DOE Project Plan for Review of the Office of Health, Safety and Security Safety Directives, approved in January 2008, to meet the principles governing Department Directives, as defined by the Secretary's memorandum of September 10, 2007, and subsequently incorporated into DOE O 251.1C, *Departmental Directives Program*, approved January 2009.

The proposed revision to the Order (Attachment 1) was developed using a multi-organizational team with representatives from the three Under Secretaries, including contractors. The team reviewed each existing safety requirement in detail and documented changes to requirements and the bases for changes as well as retained requirements (Attachment 2). An overview presentation (Attachment 3) on the proposed revision to the Order is provided for use by the Directives Review Board. The proposed revision to the Order has been reviewed by a senior staff/manager-



RECD IN MA-90 - 7/24/09

level, multi-organizational Red Team, which concluded that the Order revision was consistent with the principles governing Department Directives and is ready for DOE-wide review in RevCom.

DOE O 433.1A specifies the requirements for developing and implementing a nuclear maintenance management program (NMMP). The NMMP defines the safety management program required by 10 CFR 830, *Nuclear Safety Management*, for maintenance and the reliable performance of structures, systems and components (SSCs) that are part of the safety basis for hazard category 1, 2, and 3 DOE nuclear facilities. Safety management programs, such as the NMMP, are essential for ensuring a facility is operated in a manner that adequately protects workers, the public, and the environment. DOE O 433.1 was originally issued in June 2001 and was last revised in February 2007.

Applicability. The proposed revision to the Order applies to all DOE elements involved in the maintenance of DOE hazard category 1, 2, and 3 nuclear facilities. This applicability is consistent with the current Order.

Major Changes. Changes made in the proposed revision to the Order focus on clarification and streamlining of requirements. Proposed revisions include: (1) clarification of linkages between Order requirements and the Order's overarching nuclear safety regulation, 10 CFR 830, *Nuclear Safety Management*; (2) clarification and streamlining of the content and organization of DOE and contractor requirements; and (3) clarification and streamlining of documentation requirements that demonstrate effective NMMP planning and implementation, that includes modification of the requirement for a Maintenance Implementation Matrix to a requirement for a NMMP with supporting description documentation. Principal requirements that were clarified or enhanced are: (1) the frequency for submitting and approving NMMP description documentation and for performing DOE and contractor assessments of the NMMP; and (2) the need to review proposed changes to the NMMP, which could affect the performance of safety SSCs, as part of the ongoing unreviewed safety question process.

Open Issues. There are no open issues concerning the proposed revision to the Order. There is consensus among Directives Review Team members that the current draft is ready for RevCom. All Red Team and Defense Nuclear Facilities Safety Board review comments have been adequately resolved and there are no open issues.

Impacts on Other Directives. No conflicts with other directives or requirements were identified. DOE Guide 433.1-1, *Nuclear Facility Maintenance Management Program Guide for Use with DOE O 433.1*, is the principal supporting document and requires revision to ensure guidance is consistent with the proposed revision to the Order. DOE Standard 1181-2004, *Facility Maintenance Management Functional Area Qualification Standard*, requires revision to update training materials to reflect the proposed revision to the Order. These document revisions are anticipated to be addressed within one year of the revised Order's release.

Recommended Review Schedule. Given that the Order was developed using a multi-organizational team representing the three Under Secretaries and has subsequently been reviewed by a multi-organizational Red Team, a RevCom review and comment period of 45 days is requested.

IMPACT:

The proposed revision to Order 433.1A principally focuses on clarification and streamlining of requirements. Requirements that were modified are anticipated to result in minor or in some cases no cost to DOE or its contractors. The improvements made in the proposed revision to the Order should facilitate consistent implementation of and foster continuous improvement in this important safety management program.

CONTACT: Stephen Domotor, HS-21, 3-1018

DECISION:

Concur: _____

Nonconcur: _____

Date: _____

<u>Timeframe</u>	<u>Days</u>
<u>First Draft</u>	_____
<u>Review and Comment</u>	_____
<u>Responses and Second Draft</u>	_____
<u>Concurrence</u>	_____

Attachments

- Complete Draft of Order
- Requirements Database Report
- Overview Presentation on the Proposed Revision to the Order