

ORO CONTROL FORM - FINAL DIRECTIVE

PART A (To be completed by the Division of Primary Interest (DPI))

1. NUMBER AND TITLE OF DIRECTIVE: **ORO O 250, Chapter IV, Change 3, IMPACT ASSESSMENTS, dated 10/31/2003**

2. PURPOSE OF TRANSMITTAL: New Directive Revised Directive

3. THIS DOCUMENT MAY AFFECT THE WORK PERFORMED BY THE FOLLOWING CONTRACTORS: (Check appropriate boxes)

No (all contractors)

Yes If yes, whom? Bechtel Jacobs Co. ORAU UT-Battelle

Other contractors (list by type)

Many ORO contractors have approved Work Smart Standards (WSS) Sets or Standards/Requirements Identification Documents (S/RIDs) that may affect applicability of contractor requirements from this Directive. Applicability of contractor requirements must take into account the approved standards set for each particular contract.

4. SIGNIFICANT PROVISIONS: Are there any significant changes or impacts? No Yes
If yes, describe: This Chapter is part of the sunset review process and contains major updates.

5. CONTACT POINT: Wayne H. Albaugh Directives Management Group, AD-440 576-0974
Name Organization Telephone

PART B (To be completed by the Directives Management Group (DMG)):

6. FILING INSTRUCTIONS:

<u>Remove</u>	<u>Dated</u>	<u>Insert</u>	<u>Dated</u>
ORO Control Form	04/26/2001	ORO Control Form	10/31/2003
ORO O 250, Ch. IV, Chg. 2	04/26/2001	ORO O 250, Ch. IV, Chg. 3	10/31/2003

ORO Directives are available on the ORO Directives Management Home Page at http://www.ornl.gov/doe/doe_oro_dmg/oro_dir.htm. The ORO Directives will no longer be mailed in printed copy unless you do not have Internet capabilities.

7. APPROVED FOR DISTRIBUTION IN ACCORDANCE WITH THE OFFICIAL DIRECTIVES DISTRIBUTION LIST:

Original Signed By
Wayne H. Albaugh 10/31/2003
Signature: DMG Team Leader, AD-440 Date

INSTRUCTIONS TO ADDRESSEES: THIS FORM IS TO BE FILED WITH THE DIRECTIVE AND RETAINED

Rev. 10/31/2003

NNSA/YSO CONTROL FORM – FINAL DIRECTIVE

PART A (To be completed by the ORO DIRECTIVES MANAGEMENT GROUP, AD-440):

DIRECTIVE NUMBER, TITLE, AND DATE:

ORO O 250, CHAPTER IV, CHANGE 3, IMPACT ASSESSMENTS, dated 10/31/2003

PURPOSE OF TRANSMITTAL: _____ New Directive Revised Directive

DOES THIS DIRECTIVE CANCEL/REPLACE OR EXTEND ANY OTHER DIRECTIVES? Yes _____ No
If "Yes," list what action (cancel/replace or extend) and list the Directive(s), including the number(s), title(s), and date(s):

This directive cancels ORO O 250, Chapter IV, Change 2, IMPACT ASSESSMENTS, dated 04/26/2001

The attached Directive is forwarded for review and action. Complete Part B and forward this form to ORO DMG, AD-440, by **11/21/2003**.

PART B (To be completed by the NNSA Y-12 SITE OFFICE, Y12-01):

CONTRACTOR APPLICABILITY:

Does this Directive affect the work performed by BWXT Y-12, L.L.C.? Yes _____ No

Does this Directive affect the work performed by BWXT Y-12, L.L.C., subcontractors? Yes _____ No

If "Yes," list the subcontractors:

Many contractors have approved Standards/Requirements Identification Documents (S/RID) or Work Smart Standards (WSS) Sets that may affect applicability of contractor requirements from this Directive. Applicability of contractor requirements must take into account the approved standards set for each particular contract.

SIGNIFICANT PROVISIONS: Are there any significant changes or impacts? _____ Yes No

List summary of Directive changes and, **if "Yes"** above, describe the significant changes or impacts:

IMPLEMENTATION: Does the Directive contain special implementation requirements and/or dates? _____ Yes No

If "Yes," describe:

FOR DOE DIRECTIVE – SUPPLEMENTAL DIRECTIVE REQUIRED?

Is a new or revised supplemental Directive required? _____ Yes No

If "Yes," target date for submission of YSO Directive is _____.

IDENTIFY CONTACT POINT: Diane McCarten 576-9330
Name Telephone

APPROVED BY COR FOR DIRECTIVES: Diane McCarten 11/17/2003 576-9330
Original Signed By Signature Date Telephone

PART C (To be completed by the ORO DIRECTIVES MANAGEMENT GROUP, AD-440):

DOE Directives are available on the DOE Directives Portal at <http://www.directives.doe.gov/>. ORO Directives are available on the ORO Directives Management Group Home Page at http://www.ornl.gov/roe/roe_oro_dmg/oro_dir.htm. Directives will no longer be mailed in printed copy unless you do not have Internet capabilities.

APPROVED FOR DISTRIBUTION IN ACCORDANCE WITH OFFICIAL DIRECTIVE DISTRIBUTION LIST:

Wayne H. Albaugh, AD-440 11/19/2003
Original Signed By Name Date

INSTRUCTIONS TO ADDRESSEES: THIS FORM IS TO BE FILED WITH THE DIRECTIVE AND RETAINED.

(Revised 11/06/2003)

U.S. Department of Energy

Oak Ridge Operations

ORO O 250
Chapter IV
Change 3

DATE: 10/31/2003

SUBJECT: IMPACT ASSESSMENTS

1. PURPOSE. This Chapter correlates to Department of Energy Acquisition Regulation (DEAR) 970.5204-78, *Laws, Regulations, and DOE Directives* (JUN 1997) or the current version which is DEAR 970.5204-2, *Laws, Regulations, and DOE Directives* (DEC 2000). It assigns responsibility and accountability and provides administrative and/or contractual guidance to Oak Ridge Operations (ORO), the National Nuclear Security Administration (NNSA) Y-12 Site Office (YSO), and their contractors on the development and maintenance of contract appendixes listing of applicable Directives (i.e., List B Requirements). Nothing in this issuance changes any requirements contained in any Department of Energy (DOE) Directive.
2. CANCELLATION. This Chapter cancels and replaces ORO O 250, Chapter IV, Change 2, IMPACT ASSESSMENTS, dated April 26, 2001.
3. APPLICABILITY. The provisions of this Chapter apply to the Federal and site/facility management contractor staffs who perform work related to the four prime contracts with List B requirements (List B) administered by the Directives Management Group (DMG).
4. RESPONSIBILITIES.
 - a. Divisions of Primary Interest (DPIs) review new and revised DOE/ORO Directives to identify new, modified, or deleted requirements or guidance and establish ORO's position on applicability of the document to particular contracts. This information is provided to DMG via the DOE or ORO Directive Control Form within 10 working days after receipt. See ORO O 250, Chapter II, ORO DIRECTIVES SYSTEM, and ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM.
 - b. Contracting Officers (COs) issue a contract modification to incorporate the revised List B into the contract via the approved Requirements Change Notice (RCN) which includes non-environment, safety and health (non-ES&H) Directives (i.e., Administrative Directives) and environment, safety, and health (ES&H) Directives; Work Smart Standards (WSS) Sets; and/or Standards/Requirements Identification Documents (S/RIDs).
 - c. Contracting Officer's Representatives (CORs).
 - (1) Maintain List B per Delegation of Authority from the COs.
 - (2) Sign correspondence requesting an impact assessment from the contractor. If impact assessment correspondence is not signed, then a justification is provided to DMG to be

placed in the official file. YSO does not need to provide a justification if the NNSA/YSO Control Form – Final Directive for the DOE or ORO Directive states that the Directive is not applicable to the contractor.

- (3) Approve S/RID changes.
 - (4) Approve WSS Set revisions.
 - (5) Approve implementation plans (IPs).
 - (6) Approve RCNs.
 - (7) As needed, requests technical expertise from the DPI.
 - (8) As requested, provides the contractor clarification or guidance.
- d. Y-12 Site Office reviews new and revised DOE/ORO Directives to establish YSO's position on applicability of the document to their contracts. This information is provided to DMG via the NNSA/YSO Directive Control Form within 10 working days after receipt. See ORO O 250, Chapter II, ORO DIRECTIVES SYSTEM, and ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM.
- e. Team Leader, Directives Management Group.
- (1) Provides advice and assistance on the requirements of this Chapter.
 - (2) Transmits new or revised DOE/ORO Directives to the DPIs and the YSO for review.
 - (3) Assists the CORs in maintaining List B. This includes preparation of impact assessment letters, Directive deletion letters, and Directive extension letters for COR's signature and distribution of these letters via e-mail, with the exception of YSO. YSO letters are distributed via hard copy by YSO staff; however, DMG transmits the YSO impact assessment letter via e-mail to the contractor contact as a courtesy.
 - (4) Assists the CORs by performing analysis of issues.
 - (5) Maintains the official impact assessment files for informational and historical purposes, including any justifications for not signing impact assessments, if provided by the CORs or their staff.
 - (6) Tracks COR's request for impact assessments and contractor impact assessment responses in DMG's tracking system. This is utilized in the verification of RCNs (see ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES).

5. REQUIREMENTS AND PROCEDURES.

- a. Background. ORO's and YSO's contracts provide for the development of List B which is an appendix to the contract per DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract). List B is updated via a RCN which is issued by a contract modification. See

ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES. Administrative requirements for all applicable DOE or ORO Administrative Directives or portions thereof (i.e., CRD) are listed in List B by annotation in the RCN. ES&H requirements for all applicable DOE or ORO Directives or portions thereof (i.e., CRD) are listed in List B by (1) annotation in the RCN, (2) approved WSS Sets, and/or (3) approved S/RIDs.

If an impact assessment requires a new WSS Set or a revision to a WSS Set, see ORO O 250, Chapter V, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS. If an impact assessment requires change to a S/RID, see ORO O 250, Chapter VII, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS.

- b. Referral and Review of Directives for Inclusion in List B. DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract) provides the contractor with the opportunity to assess the effect of the contractor's compliance with the revised list on contract cost and funding, technical performance, and schedule; and identify any potential inconsistencies between the revised list and the other terms and conditions of the contract. The contractor and the CO shall identify and, if appropriate, agree to any changes to other contract terms and conditions, including cost and schedule, associated with the revision of List B.

For ORO, impact assessment request letters are prepared for the COR's signature after a signed completed Control Form is returned to DMG from the DPI. For YSO, impact assessment request letters are prepared at the same time as draft Control Forms and sent under memorandum along with a copy of the Directive to the COR. If the YSO impact assessment request letter is required, the signed letter is returned to DMG along with the completed signed Control Form. If the YSO impact assessment request letter is not required, the signed letter is destroyed or returned to DOE with a note stating an impact assessment is not required. See ORO O 250, Chapter II, ORO DIRECTIVES SYSTEM, and ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM, for further information.

- (1) DMG prepares correspondence for the COR's signature to request an impact assessment from the contractor (which is a review of the Directive for applicability, consistency with other provisions of the contract, and cost and schedule) for each new/revised DOE or ORO Directive that the DPI or YSO considers to be applicable to a particular contract.
- (2) COR returns the completed, signed letter to DMG. If the COR decides not to sign the impact assessment correspondence, the COR must provide a justification to DMG. YSO does not need to provide a justification if the NNSA/YSO Control Form – Final Directive for the DOE or ORO Directive states that the Directive is not applicable to the contractor.
- (3) DMG distributes the impact assessment request letter to the contractor via e-mail, with the exception of YSO. YSO letters are distributed via hard copy by YSO staff. However, DMG transmits the YSO impact assessment request letter via e-mail to the contractor contact as a courtesy.
- (4) Review of Administrative (i.e., Non-ES&H) Directives.
 - (a) The contractor provides written notification to the COR, with a copy to DMG, of the results of the impact assessment. As part of the impact assessment, the

contractor determines (1) whether it agrees that the Directive is applicable, (2) if an IP is required (i.e., the Directive cannot be implemented within existing funds and/or within 120 calendar days from the date of the COR's request for an impact assessment), and (3) other information required by DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract). The impact assessment is due within 30 calendar days of the date of the COR's request letter or as directed in the text of the letter.

- (b) DMG provides a copy of the contractor's impact assessment to the DPI.
- (c) If the contractor requests further guidance on the implementation of a Directive, it is provided by either the COR or the DPI.
- (d) If the contractor determines that the Directive is applicable and consistent with the contract, the COR adds the Directive to List B at its next scheduled revision. List B Requirements are at a minimum revised quarterly via a RCN issued by a contract modification signed by the CO. See ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES.

If the contractor determines the Directive to be not applicable or inconsistent with the contract and the representatives from the COR or the DPI disagree, then the COR, DPI, and the contractor work to resolve the disagreement.

- (e) If an IP is required, the contractor prepares an IP that meets the requirements of ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS.
- (5) Review of ES&H Directives.
- (a) The contractor provides written notification to the COR, with a copy to DMG, of the results of the impact assessment. As part of the impact assessment, the contractor determines (1) whether it agrees that the Directive is applicable, (2) if a new or revised WSS Set or a S/RID change is required, (3) if a S/RID change is required, then the type must be stated, and (4) other information required by DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract). The impact assessment is due within 30 calendar days of the date of the COR's request letter or as directed in the text of the letter.
 - (b) DMG provides a copy of the contractor's impact assessment to the DPI.
 - (c) If the contractor requests further guidance on the implementation of a Directive, it is provided by either the COR or the DPI.
 - (d) If the contractor's impact assessment commits to a new/revised WSS Set or S/RID change, it is due to the COR, with a copy to DMG, within 60 calendar days from the date the impact assessment is submitted by the contractor.

For new/revised WSS Set requirements, see ORO O 250, Chapter V, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART

STANDARDS SET. For S/RID change requirements, see ORO O 250, Chapter VII, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS.

- (e) The COR approves or disapproves the new/revised WSS Set or the S/RID change within 30 days and notifies the contractor as described in ORO O 250, Chapters V and VII.
- (f) If the new/revised WSS Set or S/RID change is approved, the COR adds/updates List B at its next scheduled revision. List B Requirements are at a minimum revised quarterly via a RCN issued by a contract modification signed by the CO. See ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES.

If there are disagreements on an new/revised WSS Set or S/RID change, the COR, DPI, and the contractor work to resolve the disagreement.

- (g) If an IP is required for a new/revised WSS Set or S/RID change and the IP is not addressed in the new/revised WSS Set or S/RID change, then the contractor provides a notification to the COR, with a copy to DMG, within 30 calendar days from approval of the new/revised WSS Set or S/RID change.
- (h) If an IP is required (i.e., the contractor cannot come into compliance with a new/revised WSS Set or S/RID change to List B within existing funds or within 120 calendar days from the date the new/revised WSS Set or S/RID change is approved by COR), the contractor prepares an IP. The IP is due 120 calendar days from the date of the COR's letter of approval. For IP requirements, see ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS.

- c. Notification of Directives Eligible for Removal from List B. DOE or ORO Directives **cannot** be removed from List B without approval by the COR.
 - (1) DMG receives notification of cancellation of a DOE Directive or publishes a cancellation notice for an ORO Directive. DMG prepares correspondence for the COR's signature notifying the contractor that the directive can be removed from List B.
 - (2) DMG distributes the impact assessment request letter to the contractor via e-mail, with the exception of YSO. YSO letters are distributed via hard copy by YSO staff. However, DMG transmits the YSO impact assessment request letter via e-mail to the contractor contact as a courtesy.
 - (3) The contractor removes the directive from List B via the next RCN (see ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES).
- d. Notification of an Extension of Directives on List B.
 - (1) DMG receives notification of an extension of a DOE Directive or publishes an extension notice for an ORO Directive. DMG prepares correspondence for the COR's signature notifying the contractor of the extension notice.

- (2) DMG distributes the impact assessment request letter to the contractor via e-mail, with the exception of YSO. YSO letters are distributed via hard copy by YSO staff. However, DMG transmits the YSO impact assessment request letter via e-mail to the contractor contact as a courtesy.
- (3) The contractor adds a note to the extended directive in the “Notes and Comments” column stating the extension notice number and the extension date on the next RCN (see ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES).

NOTE: The extension notice itself does not need to be added to the RCN on the numbered list. However, some contractors optionally choose to list extension notices.

6. REFERENCES.

- a. DEAR 970.5204-78, LAWS, REGULATIONS, AND DOE DIRECTIVES (JUN 1997).
- b. DEAR 970.5204-2, LAWS, REGULATIONS, AND DOE DIRECTIVES (DEC 2000).
- c. ORO O 250, Chapter I, Change 3, ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW, dated October 31, 2003, and any subsequent revisions.
- d. ORO O 250, Chapter II, Change 4, ORO DIRECTIVES SYSTEM, dated October 31, 2003, and any subsequent revisions.
- e. ORO O 250, Chapter III, Change 3, ORO TECHNICAL STANDARDS PROGRAM, dated October 31, 2003, and any subsequent revisions.
- f. ORO O 250, Chapter V, Change 4, DEVELOPMENT, APPROVAL, AND MAINTENANCE OF WORK SMART STANDARDS SETS, dated October 31, 2003, and any subsequent revisions.
- g. ORO O 250, Chapter VI, Change 3, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, dated October 31, 2003, and any subsequent revisions.
- h. ORO O 250, Chapter VII, Change 3, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated October 31, 2003, and any subsequent revisions.
- i. ORO O 250, Chapter VIII, Change 1, REQUIREMENTS CHANGE NOTICES, dated October 31, 2003, and any subsequent revisions.
- j. ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM, dated October 31, 2003, and any subsequent revisions.
- k. ORO O 250, Chapter XI, DELEGATIONS OF AUTHORITY, MEMORANDUMS OF UNDERSTANDING, AND AUTHORIZATION AGREEMENTS, dated October 31, 2003, and any subsequent revisions.

7. DEFINITIONS. See Attachment 2 of ORO O 250, Chapter I, ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW, for a glossary of terms used in the ORO Standards Management Program.
8. CONTRACTOR REQUIREMENTS DOCUMENT. See Attachment 1, Contractor Requirements Document.
9. ATTACHMENT.
 - a. Attachment 1 - Contractor Requirements Document.

CONTRACTOR REQUIREMENTS DOCUMENT

Types of contractors identified in Paragraph 3 of this Chapter must comply with the requirements of Paragraph 5 of this Chapter and the following:

1. Contractors must develop management systems and processes that align with the requirements and procedures contained in this Chapter.
2. Contractors will provide impact assessments per the DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract). In addition to the requirements of DEAR 970.5204-78 or DEAR 970.5204-2 (whichever version is in the contract), the impact assessment needs to provide the following information:
 - State if the DOE or ORO Directive is applicable,
 - If applicable, state if the DOE or ORO Directive is Administrative or if it is ES&H,
 - If it is ES&H, state if a new/revised WSS Set or S/RID change is required,
 - If an S/RID change is required, state the type of the change, and
 - If it is a Administrative DOE or ORO Directive, state if an IP is required. (**NOTE:** If ES&H and if the IP is not addressed in the new/revised WSS Set or S/RID change, notify if an IP is needed within 30 calendar days after the new/revised WSS Set or S/RID change is approved.)