

U.S. Department of Energy

Oak Ridge Office

ORO O 250 Chapter VII Change 4

DATE: 04/18/2006

SUBJECT: MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS

1. PURPOSE. This Chapter assigns responsibility and accountability and provides administrative and/or contractual guidance to Oak Ridge Office (ORO) and its contractors that choose to maintain an approved Standards/Requirements Identification Document (S/RID). 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 VII, Change 3, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated October 31, 2003.
3. APPLICABILITY. The provisions of this Chapter apply to the Federal and site/facility management contractor staffs who perform work related to the ORO contracts with List B requirements (List B) administered by the Directives Management Group (DMG). Contractors who choose to develop S/RIDs must adhere to the process in this Chapter.
4. RESPONSIBILITIES.
 - a. Division of Primary Interest (DPI), as requested by the Contracting Officer's Representatives (CORs), provides technical expertise for review of S/RID change proposals.
 - b. Principal Staff participate in ongoing maintenance activities for S/RIDs.
 - c. Contracting Officer's Representatives.
 - (1) Approves S/RID changes. See ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES, of this Directive, regarding updating/adding S/RID requirements on the contract(s).
 - (2) Determines DPI involvement; and, as the COR(s) deems appropriate, provides information to the DPI.
 - d. Team Leader, Directives Management Group.
 - (1) Provides advice and assistance to ORO staff and contractors on subjects covered in this Chapter.

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- (2) If requested by the COR, coordinates review and approval of proposed changes to S/RIDs.
- (3) Incorporates approved S/RID changes into the contract.
- (4) Maintains the official S/RID files for information and historical purposes.

5. REQUIREMENTS AND PROCEDURES.

- a. Introduction. One of the options for identification of environmental, safety, and health (ES&H) standards is the maintenance of an approved S/RID. Since contractors are expected to comply with requirements related to emergency management and occurrence reporting, the S/RID must either include current Directives/standards requirements from these programs or these Directives/standards must be listed on List B.
- b. Evaluation of New/Revised DOE ES&H Directives. In response to a request from the COR for an impact assessment, contractors must document their review of new/revised ES&H Directives. The impact assessment process includes determining whether an S/RID change effort will be needed. If the contractor's impact assessment commits to a new/revised S/RID effort, 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.
- c. S/RID Content. Changes to S/RIDs must meet the following content requirements:
 - (1) Requirements. Complete references to sources of the requirements must be provided, including applicable versions of the source document. Requirements that are included should be pertinent to the scope of the S/RID and should be sufficient to provide adequate ES&H protection. Since the S/RID has been determined to be adequate to address the work and associated hazards, there is no need to automatically include new or revised requirements from DOE Directives.
 - (2) Applicability. For each requirement, applicability within the contractor's organization must be defined to the extent practicable.
 - (3) Tailored Approach and Implementation Assumptions (IAs). IAs may be used to describe key tailoring decisions or criteria, define applicability, clarify the intent of each requirement, provide cross-references, or provide other explanatory material that may help reviewers understand how the requirements will be implemented within the organization(s) covered by the S/RID. IAs are considered part of the contractual set, must be approved by DOE, and can only be changed by use of the change process included in this Chapter.
- d. Expressing Requirements in the S/RID.
 - (1) Source documents are broken down into discrete requirements within the S/RID where necessary to ensure adequate understanding of applicability. To enhance clarity, requirements may be listed separately or grouped with other related requirements into a unit. For example, if an entire section of a mandatory standard lists requirements related to a single major topic, the requirement listed in the S/RID may be the entire section.

- (2) Requirements included in the S/RID must be specific enough that technical experts within the particular program area can agree on the criteria necessary to demonstrate compliance. Statements of policy, definitions, or broad statements of intent must not be identified as requirements.
 - (3) Requirements may be quoted, characterized, or edited for inclusion in the S/RID. When a requirement from a law or regulation is edited, care must be taken to ensure that only inapplicable or unnecessary portions of the requirement are removed and that the intent of the requirement is preserved. When characterizations are used, the source reference controls the interpretation of the requirement statement. For example, if a particular section of a standard is lengthy or copyrighted and the entire section is applicable to the site or facility, it may be referenced and descriptively summarized.
 - (4) It is acceptable to generate a new requirement by combining two or more similar requirements. When combining requirements from law or regulation, care must be taken to ensure that the constructed statement accurately and completely reflects the intent of the sources. The contractor must identify primary and secondary sources of requirements under the following circumstances:
 - If the contractor develops a requirement using requirements from more than one source document.
 - If there is a Federal law requirement and an identical State law requirement. If the text is only listed once in the S/RID (e.g., from the Code of Federal Regulations), then the other source must be listed as a secondary source. This is true even if the text wording is identical.
 - All statements must be "shall or must" statements. If a nonmandatory requirement is included and revised as a "shall or must" statement, this change should be noted as an IA.
- e. S/RID Change Control.

- (1) General. An S/RID is a living document and must be kept up-to-date to reflect the current scope of work, hazards, missions, and expectations. An approved S/RID may need change/revision in response to a number of conditions, such as the following:
 - Work that may involve hazards not covered by the S/RID;
 - The impact assessment of new or revised source documents for requirements that would provide additional cost-effective safety benefits;
 - Operating experience, related experience from other DOE and commercial facilities, relevant research, and lessons learned;
 - Changes in mission, activities, or configuration;
 - Perceived inadequacy of the S/RID or unfeasibility of requirements contained therein; or

- Changing DOE or contractor management expectations.

Some of the necessary changes will be significant and extensive and others will be minor and narrowly focused. The change process defined below is designed to provide positive document control and graduated review of changes depending on their complexity. Either ORO or the contractor may identify the need for a change to the S/RID.

Approval of changes to S/RIDs does not mean that an associated implementation plan (IP), request for funding, or exemption request is approved. Approval processes for IPs and Exemption Requests are defined in ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, of this Directive.

- (2) Change Processes. This process is designed to permit a streamlined process with limited evaluation for simple changes, while a more rigorous process is used for complex changes. S/RID changes may be proposed at any time.
- (3) Access to the S/RID. Contractors must:
 - (a) Maintain the approved, controlled-access, S/RID on the Internet and provide controlled access to DOE;
 - (b) Provide a hard copy printout of the S/RID in a timely manner on request; and
 - (c) Provide a hard copy printout of the S/RID(s) to the COR and DMG 30 calendar days after the end of the fiscal year.

f. Change Categories.

(1) Type 1.

- (a) Type 1 Description. Type 1 includes basic maintenance changes that do not impact the level of commitment or the scope, coverage, or interpretation of requirements and standards. The Type 1 change category includes the correction of typographical errors only.
- (b) Notice of Intent. When the contractor sends out a change notice it should include the following information:
 - Scope of change
 - Functional Area impact
 - Lead contractor point of contact
 - Identification of source documents affected
- (c) Processing Type 1 Changes. While ORO may identify needed Type 1 changes, it is the contractor's responsibility to make the changes and to notify ORO. Changes are made by incorporating the change into the master S/RID set. The contractor sends out a change notice (hard copy or e-mail) to affected contractor organizations, the appropriate COR(s), and DMG. A list of Type 1 changes must be included as part of the annual update provided to ORO.

(2) Type 2.

(a) Type 2 Description. Any change made to a S/RID that does not meet Type 1 criteria or does not call into question the continued adequacy of the approved S/RID is considered a Type 2 change and shall be processed as such.

(b) Processing Type 2 Changes. Although ORO or the contractor can initiate a Type 2 change, for readability this section is written as if the contractor were requesting the change.

1 Preliminary Discussions -- The contractor must arrange for advance discussion of the proposed change with appropriate ORO and/or matrix DPI personnel. The purpose of these discussions is to obtain verbal agreement with the proposed changes and speed up the formal ORO review and approval process. Failure to hold these discussions can result in summary rejection of the change proposal by ORO. If the contractor does not know the appropriate ORO contacts, DMG can help obtain the names.

2 S/RID Change Proposal -- The contractor notifies the COR in writing, with a copy to DMG, of its proposed S/RID change. The 30-day review clock starts with the date of the receipt of a copy by DMG. The S/RID change proposal must include the following:

- Names of the ORO and/or contractor personnel who have held preliminary discussions on the proposed changes;
- Proposed effective date of the intended changes;
- Summary of the intended changes;
- Reasons for the changes and an explanation of why it will have no significant impact on the adequacy of the S/RID, including a brief discussion of any expected impact of the changes on ES&H areas, missions, and funding;
- A requirement change matrix summary showing the specific additions, deletions, or modifications that are proposed; and
- An electronic version (Access database) of the requirement change matrix summary. This data is used to maintain ORO's S/RID change tracking database.

(c) ORO Review and Response.

1 DMG provides a copy for review of the S/RID change proposal and an S/RID Change Comment/Concurrence Form to the appropriate COR. (See Attachment 2, DOE/ORO Comment/Concurrence Form for S/RID Change, of this Chapter.)

- 2 The COR reviews the S/RID change proposal and fills out and signs the S/RID Change Comment/Concurrence Form, including the Contact Point information. The COR has 30 calendar days to approve, reject, or place it in abeyance. The COR forwards the signed S/RID Change Comment/Concurrence Form to DMG.
- 3 Upon receipt of the completed, signed S/RID Change Comment/Concurrence Forms from the COR, DMG sends an e-mail, with the signed S/RID Change Comment/Concurrence Form attached, to notify the contractor of ORO's decision (i.e., approval of all, some, or none of the proposed changes).
- 4 If the ORO COR does not provide a response to the contractor for resolution of the proposed change within 30 calendar days, the change proposal is automatically approved. If additional time is required, the COR must respond to the contractor with a justification with a copy to DMG.

NOTE: The change proposal is automatically approved if the COR does not provide a response to the contractor within 30 calendar days. If additional time is required, the COR must respond to the contractor with a justification and a copy to DMG.

(d) Implementing the Change.

- 1 The contractor makes the change by updating the master S/RID set and issuing a change notice (hard copy or e-mail) to affected contractor organizations, CORs, and DMG. The change notice must include the date of the Type 2 S/RID change and the date of COR's response.
- 2 DMG ensures that the approved change to the S/RID FA is listed in the next RCN. The change becomes contractually binding when included in a contract modification which includes an approved RCN.

(3) Type 3.

- (a) Type 3 Description. Type 3 S/RID change proposals call into question the continued adequacy of the S/RID as a result of changes to the work, the standards, or other circumstances.
- (b) Processing Type 3 Changes. Type 3 S/RID change proposals are processed in same manner as Type 2, but will require senior management involvement in the process.

- g. S/RID Compliance. The approved S/RID contains ES&H requirements enforceable by contract. Contractors initiate implementation planning for unimplemented S/RID requirements as soon as any changes are incorporated into the contract.
- h. S/RIDs on the Internet. The DMG Home Page contains links to S/RIDs that are posted on contractors' home pages.

6. REFERENCE.

ORO O 250, Revision 8, STANDARDS MANAGEMENT PROGRAM, dated April 18, 2006, ALL CHAPTERS, and any subsequent revisions.

7. DEFINITIONS. See Attachment 2 of ORO O 250, Chapter I, ORO STANDARDS MANAGEMENT PROGRAM OVERVIEW, of this Directive, for a glossary of terms used in the ORO Standards Management Program.

8. CONTRACTOR REQUIREMENTS DOCUMENT. See Attachment 1, Contractor Requirements Document.

9. ATTACHMENTS.

a. Attachment 1 - Contractor Requirements Document.

b. Attachment 2 – DOE/ORO Comment/Concurrence Form for S/RID Change.

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors that maintain DOE-approved Standards/Requirements Identification Document (S/RIDs) must comply with Paragraph 5 of this Chapter and with the following:

1. Make changes to an approved S/RID, in accordance with the requirements of this Chapter.
2. Appoint a central point of contact for processing S/RID changes and notify Directives Management Group (DMG) and the Contracting Officer's Representative (COR) of that person/organization.
3. The S/RID change proposal is due to the COR, with a copy to DMG, within 90 calendar days from the date the COR requests an impact assessment.
4. When an implementation plan is necessary, see ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, of this Directive.

CONTRACTOR NAME
DOE/ORO COMMENT/CONCURRENCE FORM
S/RID CHANGE

FUNCTIONAL AREA _____
PACKAGE NO. _____

PART A (To be completed by the Directives Management Group, AD-440)

TO: [COR]

SUBJECT: TYPE 2 S/RID CHANGE

DOCUMENT:

The attached proposed S/RID Change is forwarded for review. Complete Part B and fax this Form to Team Leader, DMG, AD-440, by **[due date]** at 576-4046.

PART B (To be completed by the addressee [COR]): **NOTE:** Review of the proposed change should be made by Subject Matter Experts familiar with the contractor's programs.

CONCURRENCE: (Check One).

Yes ___ = Concurrence with the proposed S/RID Change in its entirety

No ___ = Nonconcurrence. Identify specific issues. Attach extra sheets if necessary.

CONTRACTING OFFICER'S REPRESENTATIVE

IDENTIFY CONTACT POINT:

Name Telephone

SIGNED:

Signature of COR Date