

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 VII, Change 3, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, 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	04/27/2001	ORO Control Form	10/31/2003
ORO O 250, Ch. VII, Chg. 2	04/27/2001	ORO O 250, Ch. VII, 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 VII, CHANGE 3, MAINTENANCE OF
STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, 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 VI, Change 2, MAINTENANCE OF
STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated 04/27/2001

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
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
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 VII Change 3

DATE: 10/31/2003

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 Operations (ORO), National Nuclear Security Administration Y-12 Site Office (YSO), and their prime 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 2, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated April 27, 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). 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, 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/YSO staff and contractors on subjects covered in this Chapter.

- (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 per ORO O 250, Chapter VIII, REQUIREMENTS CHANGE NOTICES.

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. See ORO O 250, Chapter IV, IMPACT ASSESSMENTS.
- b. Background and Process Clarification.
 - (1) S/RID Development. S/RID requirements were selected to be appropriate to the scope of the work and the associated hazards and to provide an adequate level of protection to workers, the public, and the environment. S/RIDs were initially developed by “binning” requirements from all applicable ES&H-related laws, regulations, requirements from DOE Directives, and selected standards into Functional Areas (FAs) using the *ES&H Configuration Guide* and then paring the set down to an appropriate set of requirements. Organizations currently revise their S/RIDs because of changes in the work, the hazards, the laws, or management expectations.
 - (2) Scope of the S/RIDs Programs. S/RIDs were developed at the contract level. They contain the requirements that the contractor is contractually obligated to implement, identify any implementation assumptions (IAs) that are part of the contractual set, and identify the applicability of requirements within the set. Implementation of the set is through various work controls, such as policies, programs, procedures, work instructions, and documented practices, which must be consistent with the S/RIDs.
 - (3) S/RID Functional Area Structure. S/RIDs break down the ES&H universe into program structures with defined FAs for which requirements have been identified. Applicable requirements are binned into this structure to provide a logical order, to better identify overlaps and conflicts, and to assist in determining adequacy of the S/RID.
- c. 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. The impact assessment is due to the COR, with a copy to DMG, within 30 calendar days of the date of the COR’s letter or by the date specified in the letter. Attachment 1, Contractor Requirements Document, and ORO O 250, Chapter IV, IMPACT ASSESSMENTS, provide additional details on this requirement.
- d. 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 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.
- e. 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.

f. 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, YSO, 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 those documents are defined elsewhere.

(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.

g. 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/YSO may identify needed Type 1 changes, it is the contractor's responsibility to make the changes and to notify ORO/YSO. 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/YSO.

(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, YSO, 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/YSO Site Office 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/YSO review and approval process. Failure to hold these discussions can result in summary rejection of the change proposal by ORO/YSO. If the contractor does not know the appropriate ORO/YSO 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/YSO 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 appropriate ORO/YSO organizations, which are normally the COR and, as required, DPI. (See Attachment 2 and 3, S/RID Change Comment/Concurrence Forms.)
- 2 The appropriate organization(s), which normally are the assigned personnel in the COR's and DPI's organizations, review the S/RID change proposal and fill out and sign the S/RID Change Comment/Concurrence Form, including the Contact Point information. The assigned personnel in the COR's organization has 30 calendar days to approve, reject, or place in abeyance. The assigned personnel in the COR's organization provide the S/RID change proposal and Comment/Concurrence Form to their management (COR or DPI) for review and signature, and forward the signed Form to DMG.
- 3 As requested, DMG will facilitate meetings to reconcile differences of opinion among line management and subject matter expert reviewers.
- 4 Upon receipt of the completed, signed S/RID Change Comment/Concurrence Forms from the COR and DPI, DMG and/or COR develops a letter to notify the contractor of ORO's decision (i.e., approval of all, some, or none of the proposed changes). If the reviewers disagree on some or all of the intended changes, the COR's letter will so notify the contractor.
- 5 If the ORO/YSO 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 and the contractor may make the changes.

(d) Implementing the Change.

- f. ORO O 250, Chapter VI, Change 3, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS, dated October 31, 2003, and any subsequent revisions.
 - g. ORO O 250, Chapter VIII, Change 1, REQUIREMENTS CHANGE NOTICES, dated October 31, 2003, and any subsequent revisions.
 - h. ORO O 250, Chapter X, DOE DIRECTIVES SYSTEM, dated October 31, 2003, and any subsequent revisions.
 - i. 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, OAK RIDGE OPERATIONS (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. ATTACHMENTS.
- a. Attachment 1 - Contractor Requirements Document.
 - b. Attachment 2 – NNSA/YSO Comment/Concurrence Form for S/RID Change.
 - c. Attachment 3 – DOE/ORO Comment/Concurrence Form for S/RID Change.

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors that maintain DOE-approved 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 DMG and the 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 IP is necessary, see ORO O 250, Chapter VI, IMPLEMENTATION PLANS AND EXEMPTION REQUESTS.

CONTRACTOR NAME
NNSA/YSO 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

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 for Directives Date

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]
[DPI]

SUBJECT: TYPE 2 S/RID CHANGE

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 or DPI]): **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

DIVISION OF PRIMARY INTEREST

IDENTIFY CONTACT POINT:

Name Telephone

SIGNED:

Signature of DPI Date