

U.S. Department of Energy

Oak Ridge Operations

ORO O 250 Rev. 2 Chapter VII

DATE: 03-27-98

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) and its prime contractors that choose to maintain an approved Standards/Requirements Identification Document (S/RID). Nothing in this issuance changes any requirements contained in any DOE Order.
2. CANCELLATION. This chapter cancels and replaces ORO 250, Chapter VII, dated August 13, 1996.
3. APPLICABILITY. The provisions of this Chapter apply to ORO Principal Staff and to prime contractors with approved S/RIDs as provided by contract.
4. RESPONSIBILITIES.
 - a. Principal Staff participate in ongoing maintenance activities for S/RIDs.
 - b. Leader, Directives Management Group (DMG).
 - (1) Provides advice and assistance to ORO staff and contractors on subjects covered in this Chapter.
 - (2) Coordinates review and approval of proposed changes to S/RIDs.
5. REQUIREMENTS AND PROCEDURES.
 - a. Introduction. One of the options for identification of environmental, safety, and health (ES&H) standards is the maintenance of approved S/RIDs. Since contractors are expected to comply with directives requirements related to emergency management and occurrence reporting, the S/RIDs either must include current directives requirements from these programs or these directives must be included on the contract appendix list of applicable DOE directives (see ORO O 250, Chapter IV).
 - b. Background.
 - (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 developed by “binning” requirements from all applicable ES&H-related laws, regulations, requirements from DOE directives, and selected standards into functional areas 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 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 functional areas for which requirements have been identified. Applicable requirements were 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. S/RID Content. Changes to S/RIDs must meet the following content requirements:
- (1) Requirements. Complete references to sources of the requirements shall be provided. 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/revised requirements from DOE directives, nor is it necessary to keep a record of the rationale for not including them. Contractors are expected to evaluate new/revised source documents for requirements that would provide additional cost-effective safety benefits.
 - (2) Applicability. For each requirement, applicability within the contractor's organization shall be defined to the extent practicable.
 - (3) Tailored Approach and Implementation Assumptions. Implementation assumptions may be used to describe key tailoring decisions or criteria, define applicability, clarify the intent of the requirement, provide cross-references, or provide other explanatory material that may help reviewers understand how the requirement will be implemented within the organization(s) covered by the S/RID. Implementation assumptions 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.
 - (4) Expressing Requirements in the S/RID.
 - (a) 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.

- (b) 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 are not identified as requirements.
 - (c) 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.
 - (d) 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:
 - 1 If the contractor “constructs” a requirement using requirements from more than one source document.
 - 2 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.
 - (e) All statements must be "shall" statements. If a nonmandatory requirement is included and revised as a "shall" statement, this change should be noted as an Implementation Assumption.
- d. S/RID Maintenance: Review and Approval of Revisions.
- (1) General. An S/RID is a living document and must be kept up-to-date to reflect current scope of work, hazards, missions, and expectations. An approved S/RID may need revision in response to a number of conditions, such as the following:
 - Work that may involve hazards not covered by the S/RID;
 - Evaluation of new or revised source documents for requirements that would provide additional cost-effective safety benefits;

NOTE: The contractor is responsible for keeping abreast with additions, deletions, or changes to laws, regulations, DOE directives, and other standards included in the approved S/RIDs without formal referral by DOE).

- 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 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, corrective action plan, request for funding, or exemption request is approved. Approval processes for those documents are well defined. Approved changes that are incorporated into an S/RID may be subject to change at the time of final approval of an implementation plan or corrective action plan.

If an exemption to a regulation or law has been requested, the requirement is added to the S/RID in its entirety until the exemption is approved by the agency that “owns” the regulation or law. When an exemption to modify a requirement is approved, the pertinent text from the request approval document is added in the Implementation Assumption field. The requirement cannot be deleted from the S/RID unless the exemption approval document completely “exempts” the site from the requirement

(2) Schedule for Submission of Updates.

- (a) S/RID revisions may be proposed at any time.
- (b) Contractors shall formally submit an up-to-date hard copy version and a list of all changes made during the year to the DMG. The update is due 30 days after the end of the fiscal year. If no changes have been made, a letter to this effect satisfies the requirement.

(3) Change Categories. The change process for S/RIDs is organized around three categories of changes.

- (a) **Category 1** includes basic maintenance changes that do not impact the level of commitment or the scope, coverage, or interpretation of requirements and standards. This category includes:

- Correction of typographical errors;
- Addition of existing applicable laws and regulations that were inadvertently omitted from the S/RID; and
- Updating references to source documents when the requirements contained therein have not changed in any material manner.

Category 1 does **not** include addition of new or materially changed standards or requirements, deletion of standards or requirements, or revisions, additions, or deletions of implementation assumptions.

- (b) **Category 2** includes simple changes that do not have significant impact on the adequacy of the S/RID or reflect the addition of new work or hazards that are not substantially the same as that already covered by the S/RID. This category includes:

- Updates to reflect issuance of new or revised laws or regulations that do not have a material impact on the way work will be done;
- Revisions to other standards, including DOE directives, that cause only minor changes to the way work is being done;
- Revisions to requirements through combining or splitting apart requirements into different combinations or assignment to different functional areas;
- Addition of new work scopes with hazards that are essentially similar to those already covered by the set;
- Deletion of standards that are no longer applicable due to changes in work scope; and
- Addition or deletion of implementation assumptions where the change does not have a significant impact on the interpretation or coverage of the standard or requirement.

- (c) **Category 3** includes changes that call into question the continued adequacy of the S/RID as a result of changes to the work, the standards, or other circumstances. This includes:

- A request for an exemption from a Rule or law requirement;

NOTE: Exemptions to laws or regulations must be approved by the agency that owns the law or regulation. However, DOE needs to be aware of and participate in such requests, since DOE's input is often sought by the agency.

- A change that is prohibited by a Rule or law without prior DOE approval;
 - A change that is or can be perceived to involve a significant change in the level of safety provided or in the scope of the ES&H program, including updates, additions, or deletions of standards that might have a significant impact on the way work will be accomplished;
 - Addition of a new activity, scope of work, or hazard not already covered by the S/RID;
 - Feedback that the S/RID is no longer adequate, that it includes unnecessary and excessive requirements, or that it includes requirements that are not feasible to implement;
 - A change that involves a significant request for additional funding beyond the current budget or one that impacts negatively on currently approved funding or schedules in other areas; and
 - Any other change where DOE or the contractor wishes to conduct a formal review.
- (4) Processing Category 1 Changes. While ORO may identify needed Category 1 changes, it is the contractor's responsibility to make the changes. Category 1 changes identified by the contractor may be made without formal advance notification to ORO. Changes are made by incorporating the change into the master S/RID set. When changes are made to add existing applicable laws and regulations that were inadvertently omitted from the S/RID, the contractor sends out a change notice to affected contractor organizations, the appropriate Contracting Officer's Representative (s) (COR), and the DMG. A list of Category 1 changes must be included as part of the annual update provided to ORO."
- (5) Processing Category 2 Changes. Although either party can initiate a Category 2 change, for readability this section is written as if the contractor were requesting the change.
- (a) Notice of Intent -- The contractor organization responsible for maintaining the contractual laws and directives clause notifies the DMG (or the program COR for contracts where the DMG is not designated as the COR for Directives) of its intent at least 30 days before the proposed effective date of the change. The written notice must include the following:
- Proposed effective date of the intended change;

- Summary of the intended change;
- 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; and
- A matrix showing the specific additions, deletions, or modifications that are proposed.

If the DMG is not the COR for Directives for that particular contract, a copy of the notice must be provided to the DMG.

- (b) **Review and Response** -- The DMG will provide a copy to appropriate internal organizations for review and will reconcile differences of opinion among line management and subject matter expert reviewers. If the reviewers agree that some or all of the intended changes raise no questions concerning the adequacy of the S/RID, the DMG will notify the contractor in writing and the contractor will make the agreed-upon changes. If the reviewers disagree on some or all of the intended changes, the DMG will so notify the contractor, who may then elect to prepare a Category 3 request as outlined below. If no response to a contractor notice of intent is received by the proposed effective date, the contractor may make the changes.
 - (c) **Making the Change** -- The contractor makes the change by updating the master S/RID set and issuing a change notice to affected contractor organizations, CORs, and the DMG. The change notice must include the date of the Category 2 notice of intent and the date of response, if any.
- (6) **Processing Category 3 Changes.** Although either party can initiate a Category 3 change, for readability this section is written as if the contractor were requesting the change.
- (a) The contractor organization responsible for maintaining the contractual laws and directives clause submits a written request to the DMG (or the program COR, for contracts where the DMG is not designated as the COR for Directives). If the DMG is not the COR for Directives for that particular contract, a copy of the request must be provided to the DMG.
 - (b) The request should summarize the nature and anticipated extent of the proposed change, the reason for requesting the change, and proposed personnel to be involved in planning the change process. Depending on the nature and extent of the proposed changes, the number of personnel involved could be quite small; however, both line and staff from ORO and the contractor must be involved. Headquarters program personnel and stakeholders may be included as appropriate.

- (c) Upon receipt of a request for a Category 3 S/RID change, the DMG will consult with the appropriate line and staff organizations to discuss the proposal and identify personnel to work with the contractor to plan the change.
- (d) The personnel so identified meet with the requesting organization to discuss the need for the proposed change and plan the process to be used. The group is responsible for developing a charter for the change process that identifies the following:
 - The problem to be solved by the change;
 - Personnel to be involved in proposing specific changes to the S/RID, including identification of a leader for the process;
 - Review protocol and who will be involved in the review process;
 - Approval authorities for ORO and the contractor;
 - Schedule for completion of the change process and any other performance expectations;
 - Process and documentation requirements for the process; and
 - Need for stakeholder involvement and responsibility for obtaining it.
- (e) By following the specified process, the assigned individuals prepare the specific changes to be made, develop the appropriate documentation, and forward the proposal for review as specified in the charter. Following review and satisfactory resolution of any issues identified, the personnel involved prepare and sign a recommendation for approval, stating their belief that the S/RID as revised will be adequate to protect environment, health, and safety of the workers and the public. The proposal and recommendation is then forwarded for approval. If the review team cannot reach consensus, it takes the outstanding issue(s) to the program COR who makes the final determination
- (f) The approval authorities determine whether the chartered process was adequately followed and, if so, sign approval of the S/RID revision.
- (g) The process leader provides a copy of the approved revision and associated documentation to the DMG.
- (h) The DMG ensures that the approved S/RID change and its scope of applicability are formally incorporated into the contract via a letter signed by the appropriate COR for directives.

- d. 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. Noncompliance with existing S/RID requirements and planning for new requirements are handled in accordance with Chapter VI of this Order.
- e. S/RIDs on the Internet. The DMG home page contains links to S/RIDs that are posted on contractors' home pages [http://www.ornl.gov/doe_oro_dmg/index.htm].
- 6. REFERENCES. None.
- 7. DEFINITIONS. None.
- 8. CONTRACTOR REQUIREMENTS DOCUMENT. See Contractor Requirements Document, Attachment 1 of this Chapter.
- 9. ATTACHMENT.

Attachment 1 - Contractor Requirements Document.

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors that maintain DOE-approved S/RIDs shall comply with the following

1. Make changes to an approved S/RID, which includes the applicable DOE Rule requirements, in accordance with the requirements in paragraph 5 of this Chapter.
2. Maintain up-to-date information on the flowdown of standards/requirements contained in the S/RID into contractor procedures, plans, programs, and documented practices.
3. Appoint a central point of contact for processing S/RID changes and notify the DMG of that person/organization.
4. Register on DOE's explorer home page [<http://www.explorer.doe.gov/>] and the DMG home page [http://www.ornl.gov/doe_oro_dmg/index.htm] to receive notification of new and revised DOE and ORO Orders. Contractors are expected to review new and revised ES&H directives to determine if they wish to propose a change to their S/RID to address the subject matter contained in the directives