

# DIRECTIVES CONTROL FORM - ORO O 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, Chg. 1, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS**

2. PURPOSE OF TRANSMITTAL:  New Directive  Revised Directive  Page Change

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

No (all contractors)

Yes If yes, whom?  LMES  LMER  ORAU  SURA

Bechtel Jacobs Company

Other contractors (list by type)

*Many ORO contractors have approved S/RIDs or 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.*

4. SIGNIFICANT PROVISIONS: Are there any significant changes or impact?

No  Yes If yes, describe: This ORO Order has been revised to reflect current policy. New subparagraphs 4b, 5c, and 5f(3) have been added and subsequent subparagraphs renumbered as necessary. The previous subparagraph 5c(4) has been renumbered as subparagraph 5e (with subsequent subparagraphs renumbered) and has been revised. The previous subparagraph 5d(3) has been renumbered as subparagraph 5g (with subsequent paragraphs renumbered) and has been extensively revised. The current subparagraphs 5d(1), 5f(1)-(2), and 5i have been revised. On Attachment 1, paragraph 4 has been revised and a new paragraph 5 has been added. A new Attachment 2 has also been added.

5. CONTACT POINT: Wayne 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 O 250, Rev. 2,	03/27/1998	ORO O Control Form	01/06/2000
Chapter VII, Pages VII-1 through VII-10		ORO O 250, Chapter VII,	01/06/2000
		Chg. 1, Pages VII-1 through VII-12	

*ORO Orders are available on the ORO Directives Management Home Page at [http://www.ornl.gov/doe\\_oro\\_dmg/orchklst.htm](http://www.ornl.gov/doe_oro_dmg/orchklst.htm). The ORO Orders 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

Jennifer Hamilton Cusick, AD-440

01/06/2000

Signature Management Analyst, AD-440

Date

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

Rev. 11/30/1999

# U.S. Department of Energy

Oak Ridge Operations

ORO O 250 Chapter VII Chg. 1
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DATE: 01/06/2000

## SUBJECT: MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS

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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, MAINTENANCE OF STANDARDS/REQUIREMENTS IDENTIFICATION DOCUMENTS, dated March 27, 1998.
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. Contracting Officer's Representative (COR) approves S/RID revisions and executes the Requirements Change Notice that places the revisions in the contract.
  - c. Team 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 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 the contract appendix (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 initially developed by “binning” requirements from all applicable ES&H-related laws, regulations, requirements from DOE directives, and selected standards into functional areas 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 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. 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 revision effort will be needed and, if so, what type of change it will be. The impact assessment is due to the COR, with a copy to the DMG, within 30 days of the date of the COR’s letter or by the date specified in the letter. Attachment 1, Contractor Requirements Document, and Chapter IV of this Order 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. 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. 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.

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 are not 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:
  - (a) If the contractor “constructs” a requirement using requirements from more than one source document.
  - (b) 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.
  - (c) 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 Implementation Assumption.

f. 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;
- 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, 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. Thirty days after the end of the fiscal year, contractors must submit the following to the DMG:

- (a) An up-to-date hard copy version of all Type 1 changes made during the year; and

- (b) An electronic version in Access database of all Type 1 changes made during the year.

NOTE: If no changes have been made, a letter to this effect satisfies the requirement.

(3) Access to the S/RID. Contractors must either:

- (a) Maintain a controlled copy of the S/RID on the Internet and provide access to DOE; or
- (b) Provide a hard copy printout of the S/RID in a timely manner on request from DOE.

- g. Change Categories and Processes. The change process for S/RIDs is organized around three categories of changes. This process is designed to permit a streamlined process with limited evaluation for simple change, while a more rigorous process is used for complex changes. S/RID revisions may be proposed at any time.

(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 following:

- Correcting typographical errors;
- Adding existing applicable laws and regulations that were inadvertently omitted from the S/RID;
- Adding new/revised laws and regulations that are automatically applicable; and
- Updating references to standards when the requirements contained in the standards themselves have not changed in any material manner.

Type 1 changes **do not include** the following:

- Addition of new/revised non-regulatory standards or parts of standards; and
- Deletion of standards or parts of standards; and
- Deletion, addition, or revision of implementation assumptions.

If it is a new/revised law, it can be added as a Type 1 change. If it is a new/revised consensus standard or DOE or ORO directive, it must be processed as a Type 2 change.

- (b) Processing Type 1 Changes. While ORO may identify needed Type 1 changes, it is the contractor's responsibility to make the changes. Type 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 other than correction of typographical errors are made, the contractor sends out a change notice (hard copy or e-mail) to affected contractor organizations, the appropriate COR(s), and the 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. Type 2 includes 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 change category includes the following:

- Revisions to non-regulatory 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, revision, or deletion of implementation assumptions where the change does not have a significant impact on the interpretation or coverage of the standard or requirement.

(b) Processing Type 2 Changes. Although either party (ORO or 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 Site Office and matrix (Division of Primary Interest [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 package by ORO. If the contractor does not know the appropriate ORO contacts, the DMG can help obtain the names.

2 Notice of Intent -- The contractor organization responsible for maintaining the contractual laws and directives clause notifies the COR in writing, with a copy to

the DMG, of its intent at least 30 days before the proposed effective date of the change. The notice of intent package must include the following:

- Names of the ORO and 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 matrix showing the specific additions, deletions, or modifications that are proposed; and
- A diskette with an electronic version (Access) of the change matrix or, as it is sometimes called, the requirements report. The disk is used to maintain ORO's S/RID change tracking database.

(c) ORO Review and Response.

- 1 The DMG provides a copy of the change package and an S/RID Revision Comment/Concurrence Form to appropriate internal ORO organizations for review, which are normally the COR and DPI. (See Attachment 2, S/RID Revision Comment/Concurrence Form.)
- 2 The assigned personnel in the COR's and DPI's organizations review the S/RID change package and fill out the S/RID Revision Comment/Concurrence Form, including the Contact Point information. They provide the package and form to their management (COR or DPI) for review and signature, and then fax the signed form to the DMG.
- 3 If requested, the 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 Revision Comment/Concurrence Forms from the COR and DPI, the DMG develops a letter for the COR's signature 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, who may then elect to prepare a Type 3 change request as outlined below for the parts of the proposal that were rejected.

- 5 If no response to a contractor notice of intent is received by the proposed effective date (30-day clock), the contractor may make the changes.

(d) Making 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 the DMG. The change notice must include the date of the Type 2 notice of intent and the date of response, if any.
- 2 The DMG ensures that the approved revision is listed in the next Requirements Change Notice.

(3) Type 3.

- (a) Type 3 Description. Type 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.
- (b) Processing Type 3 Changes. Although either party can initiate a Type 3 change, for readability this section is written as if the contractor were requesting the change.
- 1 The contractor organization responsible for maintaining the contractual laws and directives clause submits a written request to the COR, with a copy to the DMG.
  - 2 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. DOE Headquarters program personnel and stakeholders may be included as appropriate.
  - 3 Upon receipt of a request for a Type 3 S/RID change request, the DMG will consult with the COR and appropriate staff organizations to discuss the proposal and identify personnel to work with the contractor to plan the change.
  - 4 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;

NOTE: If the schedule will go beyond 90 days, the COR must approve the schedule before the S/RID revision effort begins.

    - Process and documentation requirements for the process; and
    - Need for stakeholder involvement and responsibility for obtaining it.

- Extent of worker involvement in the change process.
- 5 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.
  - 6 The approval authorities determine whether the chartered process was adequately followed and, if so, sign approval of the S/RID revision.
  - 7 The process leader provides a copy of the approved revision and associated documentation to the COR, with a copy to the DMG.
  - 8 The DMG develops a letter for the COR's signature to approve the S/RID revision and ensures that the approved S/RID change and its scope of applicability are listed in the next Requirements Change Notice.
- h. 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. Planning for new/revised requirements are handled in accordance with Chapter VI of this Order.
  - i. S/RIDs on the Internet. The DMG Home Page contains links to S/RIDs that are posted on contractors' home pages. The DMG Home Page address is as follows:  
[http://www.ornl.gov/doe\\_oro\\_dmg/index.htm](http://www.ornl.gov/doe_oro_dmg/index.htm).
6. REFERENCES. None.
  7. DEFINITIONS. None.
  8. CONTRACTOR REQUIREMENTS DOCUMENT. See Attachment 1, Contractor Requirements Document.
  9. ATTACHMENTS.  
Attachment 1 - Contractor Requirements Document.  
Attachment 2 - S/RID Revision Comment/Concurrence Form.

### **CONTRACTOR REQUIREMENTS DOCUMENT**

Contractors that maintain DOE-approved S/RIDs must 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](http://www.ornl.gov/doe_oro_dmg/index.htm)] to receive notification of new and revised DOE and ORO directives.
5. Perform impact assessments of new/revised DOE and ORO ES&H directives as requested by the COR per Chapter IV of this Order. The impact assessment process includes determining whether an S/RID revision effort will be needed and, if so, what type of change it will be. If the contractor's impact assessment states that an S/RID revision effort is needed, the S/RID change package is due to the COR, with a copy to the DMG, within 90 days from the date the impact assessment is submitted.

**CONTRACTOR NAME  
S/RID REVISION  
COMMENT/CONCURRENCE FORM**

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

**TO:** [COR]  
[DPI]

**SUBJECT:** TYPE 2 S/RID REVISION FOR [CONTRACTOR NAME]

The attached proposed S/RID revision is forwarded for review. Complete Part B and fax this form to Wayne Albaugh, AD-440, by [date] at 576-4046.

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**PART B** (To be completed by the addressee [DPI or COR]): **NOTE:** Review of the proposed revision should be made by people most familiar with the contractor's programs in the subject matter area.

**CONCURRENCE:** (Check One).

Yes \_\_\_ = Concurrence with the proposed S/RID revision in its entirety

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

**IDENTIFY CONTACT POINT:** \_\_\_\_\_ [DPI or COR staff member]  
Name Telephone

**SIGNED:** \_\_\_\_\_  
Signature of DPI or COR Date