

U.S. Department of Energy

Oak Ridge Operations

ORO O 420 Chapter VIII Chg. 1

DATE: 03-31-98

SUBJECT: UNREVIEWED SAFETY QUESTIONS

1. PURPOSE. This Chapter correlates to DOE 5480.21, UNREVIEWED SAFETY QUESTIONS, dated December 24, 1991. This ORO Order assigns responsibility and accountability and provides administrative and/or contractual guidance to Oak Ridge Operations (ORO) and its contractors. Nothing in this issuance changes any requirements contained in any DOE Order.
2. CANCELLATION. This Chapter cancels and replaces ORIG 5480.21A, UNREVIEWED SAFETY QUESTIONS, dated February 28, 1994.
3. APPLICABILITY. This Chapter applies to ORO Principal Staff, management and operating (M&O) contractors, and other covered contractors responsible for the design, operation, decontamination, or decommissioning of ORO nuclear facilities.
4. RESPONSIBILITIES. Many ORO contractors have developed Standards/Requirements Identification Documents (S/RIDs) or Work Smart Standards (WSS) sets that may not include requirements referenced or included in DOE 5480.21 or this Chapter. Interpretation and performance of Federal responsibilities outlined below must take into account the approved standards set for each particular contract and must not be deemed to add any requirements to the approved set.
 - a. Manager approves Unreviewed Safety Questions (USQ) and Unreviewed Safety Question Determinations (USQD) if so delegated by the cognizant Secretarial Officer (CSO) where redelegation to subordinate levels of ORO is not authorized.
 - b. Assistant Managers approve Technical Safety Requirements (TSR) where redelegation to subordinate levels of ORO is authorized and/or approved by the CSO and formally documented by the Manager.
 - c. Director, Nuclear Safety Division.
 - (1) Upon request, conducts independent reviews of USQD and safety evaluations.
 - (2) Forwards findings and recommendations to the Contracting Officers' Representatives (COR) in a Safety Evaluation Report.
 - d. Principal Staff, under whose supervision procurement requests are initiated, perform those tasks identified in DOE 5480.21, subparagraph 9e(6)(a).
 - e. Contracting Officer's Representatives.
 - (1) Approve TSR where redelegation to subordinate levels of ORO is authorized and/or approved by the CSO and formally documented by the Manager.
 - (2) Perform those tasks identified in DOE 5480.21, subparagraphs 9e(1)-(5).

5. REQUIREMENTS AND PROCEDURES. None.

6. REFERENCES.

- a. DOE O 421.3 (formerly DOE 5480.23), NUCLEAR SAFETY ANALYSIS REPORTS, dated April 10, 1992.
- b. ORO O 420, Chapter V, DELEGATION OF APPROVAL AUTHORITY FOR DOE 5480.21, 5480.22, 5480.23, AND 5481.1B, to be published.
- c. ORO O 420, Chapter VI, NUCLEAR SAFETY ANALYSIS REPORTS, to be published.
- d. DOE/OR-901, GUIDANCE FOR PREPARATION OF SAFETY ANALYSIS REPORTS FOR NONREACTOR FACILITIES AND OPERATIONS, Revision 2, dated November 1992.
- e. Memorandum from Assistant Secretary for Nuclear Energy to Managers of DOE Field Offices, et al., Subject: Interpretation of DOE 5480.21, UNREVIEWED SAFETY QUESTIONS, dated December 29, 1992.

7. DEFINITIONS.

- a. **Unreviewed Safety Question.** A proposed change, test, experiment, or identification of an analytic inadequacy shall be deemed to involve a USQ under any of the following circumstances:
 - (1) If the probability of occurrence, consequences of an accident, or malfunction of equipment important to safety could be increased;
 - (2) If the possibility for an accident or malfunction of a different type than any previously evaluated by safety analyses could be created; or
 - (3) If any margin of safety, as defined in the bases for any TSR, could be reduced.

USQ considerations apply to temporary and permanent changes and to newly discovered pre-existing conditions.

- b. **Unreviewed Safety Question Determination.** A systematic process to determine if a proposed facility, system, procedural change, test, or experiment is a USQ. This process is also called a Safety Evaluation.

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

9. ATTACHMENTS.

Attachment 1 - Contractor Requirements Document.

CONTRACTOR REQUIREMENTS DOCUMENT

Contractors that are identified in paragraph 3 of this Chapter shall accomplish the following:

1. Perform those tasks identified in DOE O 424.1, paragraph 10, or the requirements of this Chapter as listed in the Work Smart Standards documents with additional guidance and clarification as provided by DOE O 424.1, Attachment 1.
2. When a USQ is identified:
 - a. Notify the COR and CSO.
 - b. Submit an evaluation and any changes thereto to the COR.
 - c. If directed by the COR, provide copies of the evaluation and any changes to other DOE organizations.
3. Ensure subcontractors are aware of USQ that may be affected by subcontractor work orders or other activities.
4. See ORO O 420, Chapter V, Attachment 1, for additional responsibilities delegated to contractors.