



Department of Energy
Washington, DC 20585

July 6, 2015

JM CHRONOLOGY
JM RECEIVED 7/7/15
OUT FOR REVIEW 7/27/15
DRB DISCUSSION 8/6/15

MEMORANDUM FOR: INGRID KOLB
DIRECTOR
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THROUGH: KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

FROM: MATTHEW B. MOURY
ASSOCIATE UNDER SECRETARY FOR
ENVIRONMENT, HEALTH, SAFETY AND SECURITY

SUBJECT: Notice of Intent to Revise Department of Energy Guide 424.1-1B,
*Implementation Guide for Use in Addressing Unreviewed Safety
Question Requirements.*

PURPOSE: This memorandum provides justification to revise Department of Energy (DOE) Guide (G) 424.1-1B, *Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements*. This revision is part of the quadrennial review and recertification required by DOE Order (O) 251.1C, *Department Directives Program*.

JUSTIFICATION: DOE G 424.1-1B was developed in support of Title 10 Code of Federal Regulation (CFR) 830, *Nuclear Safety Management*, Subpart B, *Safety Basis Requirements*, and provides guidance in meeting the provisions for conducting Unreviewed Safety Question (USQ) determinations as defined in 10 CFR 830.205, *Technical Safety Requirements*.

The Office of Environment, Health, Safety and Security (AU) is proposing to perform a full revision of DOE Guide 424.1-1B to incorporate lessons learned identified by DOE Program Offices since the Guide's last full revision in 2006. In 2010 a limited revision to the Guide was conducted to incorporate a clarification on use of evaluation of the safety of the situation and consolidation of the potentially inadequate safety analysis process within the Guide.

Changes and improvements identified by the Program Offices for incorporation into this revision include: 1) clarifying what constitutes equipment important to safety; 2) clarifying how margin of safety is to be applied in USQ determinations; 3) processing of potential inadequacies in safety analysis; 4) refining the scope of procedures that fall under the USQ screening/determination process, and 5) addressing numerous discrete USQ process flow problems that sites have discovered through implementation of the Guide over the years.

The Guide will be coordinated and drafted by a multidisciplinary team comprised of representatives from the National Nuclear Safety Administration, and the Offices of Science,



Rec'd 7/7/15 GS

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8-6-2015


Nuclear Energy, and Environmental Management. The requested schedule for revision is provided below.

IMPACT: The Guide does not duplicate existing laws, regulations or national standards and it does not create undue burden on the Department.

The proposed changes to DOE G 424.1-1B are expected to provide net cost savings as they clarify provisions that have been interpreted to require more work than intended.

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Concur:  Nonconcur: _____ Date: 8-6-2015

Standard Schedule for Directives Development

	<u>Days</u>
Draft Development:	Up to 120
Review and Comment:	60
Comment Resolution (Writer):	60
Final Review:	30
Total:	270