

Department of Energy

Washington, DC 20585

May 15, 2014

MEMORANDUM FOR:

INGRID KOLB

DIRECTOR

OFFICE OF MANAGEMENT

JM CHRONOLOGY
JM RECEIVED 5/14/14
OUT FOR REVIEW 5/13/19
DRB DISCUSSION 4/5/14

THROUGH:

KEVIN T. HAGERTY

DIRECTOR

OFFICE OF INFORMATION RESOURCES

FROM:

STEPHEN A. KIRCHHOFF

ACTING DEPUTY UNDER SECRETARY

OFFICE OF ENVIRONMENT, HEALTH, SAFETY AND SECUIRTY

SUBJECT:

Notice of Intent to Revise Department of Energy Guide 423.1-1A,

Implementation Guide for Use in Developing Technical Safety

Requirements

PURPOSE: This memorandum provides justification for revising Department of Energy (DOE) Guide (G) 423.1-1A, *Implementation Guide for Use in Developing Technical Safety Requirements*, dated November 3, 2010. The purpose of this revision is to incorporate lessons learned as identified by DOE program offices.

JUSTIFICATION: DOE G 423.1 was developed and issued in October 2001, in support of 10 Code of Federal Regulation (CFR) 830, *Nuclear Safety Management*, Subpart B, *Safety Basis Requirements*, also issued in 2001, which provides guidance for meeting Technical Safety Requirement (TSR) provisions defined in 10 CFR 830.205, *Technical Safety Requirements*.

In 2010, a limited-scope revision to the Guide was conducted to incorporate an Appendix to provide guidance on performing Implementation Verification Reviews (IVRs) of Safety Basis Controls. The Office of Environment, Health, Safety and Security is now pursuing a full-scope revision to capture and incorporate lessons learned. This will be the first full-scope revision to the Guide since its original issuance in 2001.

As part of the Guide's one-year accuracy review, per DOE Order (O) 251.1C, *Departmental Directives Program*, Section 7, additional changes were identified by DOE program and site offices to improve its completeness and effectiveness, which include the following: (1) adding a section on the development and use of Specific Administrative Controls, (2) adding guidance on development of TSRs, and (3) addressing numerous discrete improvements identified by DOE sites over the years. These changes are more substantive in scope than may be accomplished





via an administrative change notice; therefore, a full revision is needed to address the desired changes identified by the program and site offices responsible for implementation.

The Guide revision will be coordinated with and drafted by, a multidisciplinary team comprised of representatives from the National Nuclear Safety Administration and the Offices of Science, Nuclear Energy, and Environmental Management. The requested schedule for revision development is provided below.

There are no valid external, consensus, or other standards (e.g., ISO, VPP, etc.) available which can be used in place of this directive because this is a DOE-unique process and application.

IMPACT: The Guide does not duplicate existing laws, regulations or national standards and it does not create undue burden on the Department. There is no expectation of added time or commitment to implement the revised Guide. Incorporation of lessons learned should result in a more consistent and appropriate use and application of the Guide across the DOE complex.

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Ingrid Kolb, Director, Office of Management (MA-1):

Concur:Nonconcur:	Date: 6-5-14	_
Directive Development Schedule	<u>Days</u>	
Draft Development	30 adding 2 week	Ls
Review and Comment (RevCom)	30 Colling	
Comment Resolution	30 adding weess	
Final Review	30 \ 10 10	
Total	150	