Environmental Restoration Information Resource Management Program Plan

Environmental Restoration Program
P.O. Box 2003
Oak Ridge, Tennessee 37831-7298

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MARTIN MARIETTA ENERGY SYSTEMS, INC.
managing the

Environmental Restoration and Waste Management Programs at
Oak Ridge K-25 Site
Oak Ridge Y-12 Plant
Oak Ridge National Laboratory
under contract DE-AC05-84OR21400

Paducah Gaseous Diffusion Plant
Portsmouth Gaseous Diffusion Plant
under contract DE-AC05-76OR00001

for the
U.S. DEPARTMENT OF ENERGY

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ACRONYMS

AR	Administrative Record
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
ECC	Emergency Control Center
Energy Systems	Martin Marietta Energy Systems, Inc.
ER	Environmental Restoration Program
ERWM	Environmental Restoration Waste Management Program
ES&H	Environmental Safety and Health
D&D	decontaminating and decommissioning
DMC	document management center
DOE	U.S. Department of Energy
DOERS	U.S. Department of Energy Records Schedule
DQI	Data Quality Investigation
EOC	Emergency Operating Center
FRC	Federal Records Center
FS	feasibility study
FFA	Federal Facility Agreement
FPMR	Federal Property Management Regulation
GAO	General Accounting Office
GRS	General Records Schedule
IMS	Information Management Services
IRM	Information Resource Management (Program)
NARA	National Archives and Records Administration
ORO	Oak Ridge Operations
ORNL	Oak Ridge National Laboratory
ORR	Oak Ridge Reservation
OSHA	Occupational Safety and Health Administration
OU	operable unit
QA	quality assurance
RI	remedial investigation
RIDS	records inventory and dispositions schedule
STARR	site technical Administrative Record review
USC	United States Code
WBS	work breakdown structure
WM	Waste Management

1. INFORMATION RESOURCE MANAGEMENT BACKGROUND

1.1 DOCUMENT PURPOSE

The purpose of the Environmental Restoration Information Resources Management (ER IRM) Program Plan is to define program requirements, organizational structures and responsibilities, and work breakdown structure (WBS) and to establish an approved baseline against which overall progress of the program as well as the effectiveness of its management will be measured. This plan will guide ER IRM Program execution and define the program's essential elements. This plan will be routinely updated to incorporate key decisions and programmatic changes and will serve as the project baseline document. Environmental Restoration Waste Management (ERWM) Program intersite procedures and work instructions will be developed to facilitate the implementation of this plan.

1.2 SCOPE

The scope of this activity includes the management and the coordination of records management and document control and Administrative Record (AR) activities by (1) Martin Marietta Energy Systems, Inc. (Energy Systems), (2) U.S. Department of Energy (DOE) Oak Ridge Operations (ORO) ER Division, and (3) associated DOE-ORO prime contractors. This pertains to all records generated or received by or for the DOE-ORO ER Program in support of ER-funded activities performed at the Oak Ridge Reservation (ORR)—Oak Ridge K-25 Site; Oak Ridge National Laboratory (ORNL); Oak Ridge Y-12 Plant; Portsmouth and Paducah gaseous diffusion plants; and off-site areas adjacent to the Oak Ridge facilities referred to as the ORR off site area. These records are generated by Energy Systems, DOE-ORO ER Program, DOE-ORO ER prime contractors, and subcontractors. A record is defined to include all books, papers, maps, photographs, machine-readable materials, or other documentary materials regardless of physical forms or characteristics, which are made or received by an agency of the U.S. Government. Records are protected by federal law or in connection with the transaction of public business and are preserved or can be preserved by the agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the government.

1.3 MISSION STATEMENT

The mission of the ER IRM Program is to establish an integrated, compliant, and cost effective information management system from a single multisite platform in support of DOE-ORO ER Program remediation activities.

1.4 PROGRAM GOALS AND TECHNICAL OBJECTIVE

The following are the programmatic goals of the ER IRM Program:

- establish and maintain legally defensible ARs;
- develop a compliant records management and document control system;
- establish document management centers that provide access to ER records throughout their life cycle;
- develop specific ER project file methodologies in support of ER activities;
- as integrating contractor, ensure standard implementation of AR and records management and document control requirements;
- develop and implement a comprehensive DOE-ORO ER information management system establishing Energy Systems as the record copy holder for all DOE-ORO ER Program records.

The technical objective of the ER IRM Program is to serve as a center of excellence in the development, implementation, and management of compliant and economically sound ER records management and document control systems. In addition to meeting all regulatory requirements, records generated by or for the ER Program must be converted to a user-friendly information resource platform and be available to ER project managers and personnel as a tool to more effectively manage ER work. To effectively support the ER Program, the ER IRM must remain current with the dynamic operational, regulatory, and technical ER multisite and multicontractor program activities. This will be accomplished through the use of dedicated project management with an emphasis on the best management practices, teamwork, and customer satisfaction.

2. INFORMATION RESOURCE MANAGEMENT DESCRIPTION

2.1 RECORDS MANAGEMENT PROGRAM RISK ASSESSMENT

Certain potential program risks must be addressed and resolved to ensure achievement of the mission and goals (Sects 1.3 and 1.4). These risks and the proactive measures the ER IRM Program will take to address these concerns are listed below.

- *Noncompliance with records storage requirements*—Utilize newly acquired space to provide dual storage in a graded approach, and actively pursue alternate storage mediums.
- *Lack of ER Program confidence and cooperation*—Demonstrate program ability to accomplish defined goals and provide diligent, effective, and responsive attention to ER Program needs.
- *Lack of operational consistency between ER site programs*—Ensure procedures developed are at a standard implementation level and actively support integration of site activities.
- *Impacts of unforeseen corporate initiatives such as the ERWM integration, "Reinventing Martin Marietta," and the current reduction in force*—Establish an ongoing awareness and process to evaluate and address programmatic impacts of potential corporate initiatives and flowdown requirements.

2.2 ORGANIZATION, ROLES, AND RESPONSIBILITIES

2.2.1 Organizational Components

The ER IRM Program is comprised of three key components: AR management; document control and records management; and information systems management. The ER IRM Program manager reports to the ER Compliance and Risk Integration manager who reports to the ER director. Figure 1 illustrates the ER IRM Program's organizational structure. Figure 2 demonstrates the reporting line within the ER Program.

2.2.2 Roles and Responsibilities

The ER IRM Program manager directs, coordinates, and administers the budgeting, development, application, implementation, and oversight of ER IRM Program activities and staff. The ER IRM Program manager must integrate Energy Systems with ER Program and site program-specific records requirements and applications. The following are area managers reporting to the ER IRM Program.

- **AR manager** as lead integrating contractor, provides technical and practical interpretation of the National Contingency Plan/Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as it pertains to the AR to ensure compliant and standardized compilation. This manager also develops and maintains standards and procedures required to ensure the same; provides oversight responsibility for Portsmouth and Paducah; and manages staff in the accomplishment of these tasks.

Fig. 1. Environmental Restoration Information Resource Management Program organization chart.

Fig. 2. Environmental Restoration Program organization chart.

- **Records Management and Document Control manager** develops and implements a records management and document control system based on flowdown requirements defined in Energy Systems Procedures IO-101 and 201 to manage ER record copies. This manager coordinates with both Energy Systems and ERWM divisional records management to integrate all statutory, DOE, and Energy Systems records management policies into ER; manages and operates the ER Central Document Management Center (DMC) and satellites; develops ER specific records requirements such as CERCLA and D&D specific project file criteria; and manages staff in the accomplishment of these tasks.

Information Management Services (IMS) provides personnel with records experience to develop the records management and document control systems and operate the document management centers. As illustrated in Fig. 1, IMS is a matrix organization that will provide the Records Management and Document Control manager, DMC group leader, and nine information assistants to staff the central and satellite DMCs.

- **Information Systems manager** formulates ER IRM information management policies, procedures, and automated systems requirements and ensures integration into records management and document control systems. This manager interprets and ensures adherence to DOE and Energy Systems guidance related to the management of electronic information; manages development and implementation of a comprehensive distributed electronic information system that supports DOE-ORO ER activities for Energy Systems and their associated prime contractors; provides oversight responsibility for related Paducah and Portsmouth activities; and is responsible for the administration and management of resources necessary in the accomplishment of these tasks.

23 REQUIREMENTS

Records management, document control, and AR requirement units will be documented and maintained in a programmatic compliance baseline as part of the ER Compliance Management Program. Implementing procedures will be adopted at the highest level of prescription integrated with the ERWM Compliance Management Program and charted to ensure that permitted gaps in procedural flowdown are filled with an appropriate level of instruction throughout the ER Program.

AR, records management, and document control requirements are regulatory driven and compliance must be ensured. The ER Program/site-specific requirements do not have direct regulatory drivers, but they integrate ER-specific processes granting the ER Program efficient and relevant utilization of information.

23.1 CERCLA AR Requirements

The CERCLA AR requirements have been summarized in Table 1 (See Appendix).

Established under Sect. 113 of CERCLA, the AR serves two primary purposes. First, under Sect. 113(j), judicial review of an issue concerning the adequacy of the response selection is limited to the contents of the AR. However, to the extent to which the agency attain the benefits of limited judicial review depends on the quality and completeness of the

record. Second, Sect. 113(k) requires that the AR act as a vehicle for public participation in selecting the response action and documenting that process.

An AR file will be created for each OU upon regulatory approval of a remedial investigation work plan or regulatory approval to proceed based on other criteria. Subsequent documentation, as defined by AR file criteria, will be included in the AR file contemporaneously with the remedial or removal action work performed on that operable unit. After the Record of Decision document has been signed with appropriate signatures, a site technical AR review (STARR) meeting will be held as a final review of the AR file contents by DOE-ORO ER and all ER prime contractors. The recommended AR will be established and submitted to DOE-ORO ER for submittal for written approval to the environmental regulators.

CERCLA requires that each AR file and AR be maintained at two locations; a federal facility and an off-site location designated for public access. Energy Systems AR staff will initiate and designate documents for inclusion in the AR files and turn these documents over to the ER Central DMC to be retained as the on-site copy. Energy Systems AR staff will transmit a copy of all public AR file documents and other pertinent information to DOE-ORO ER technical support contractor staff located at the Information Resource Center, 105 Broadway, Oak Ridge, Tennessee. They will be responsible for maintaining and presenting the off-site copy to the public.

The following integrating contractor standard and procedure were developed, issued, and successfully implemented. Consistent maintenance and a continuing training program ensure AR compliance and excellence.

- Standard ER/C-S1505, Rev. 0, "Roles and Responsibilities of Martin Marietta Energy Systems, Inc., as the Integrating Contractor for the Administrative Record." April 6, 1993.
- Procedure ER/C-P1506, Rev.0, "Martin Marietta Energy Systems, Inc., Management of the Environmental Restoration Program," December 14, 1992.

2.3.2 DOE/Energy Systems Records Management and Document Control Requirements

DOE-ORO ER and Energy Systems Records Management and Document Control requirement units have been identified in Tables 2 and 3 (See Appendix).

Established under *CFR* 36, Chap. 12, National Archives and Records Management, the requirements for managing government records cover the creation, identification, maintenance, retention, and disposition of the records. To address these requirements, this program will establish a consistent work flow process for ER records. Figure 3 charts the work flow process for records originated within the Energy Systems ER Program, and Figure 4 charts the process for ER records originated outside Energy Systems ER. Procedures will be developed or revised to ensure standard implementation of records management activities, including the appropriate integration of site records activities. To facilitate program compliance and to more effectively utilize current resources, a graded approach methodology will be applied to program development and implementation. Training will be developed and updated as required to provide ER personnel with the knowledge and skills necessary to

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Fig. 3. Work flow process for

Fig. 4. Work flow proc

for records originated outside Energy Systems.

maintain a successful and standardized records management program. A self-assessment module will be developed to ensure adherence to ER records management policies and procedures. Combined, these activities will ensure the capture and maintenance of ER records and will provide the platform for a comprehensive electronic information system proposed for the ER Program.

The ER Central DMC serves as the hub of all ER records activities and will house the official record copy of ER-generated/sponsored materials. Building K-1002 is currently under renovation and will provide 7000 sq ft of records storage and work space. The ER Central DMC has established satellite centers to provide project files that are accessible to project personnel and to assist in capturing project-specific records. Currently, satellite centers support each of the following ER programs: the K-25 Site, the Y-12 Plant, ORNL, Clinch River, and the Ponds Waste Management Program. The central and satellite DMCs are in the process of becoming a network. In preparation for this network, the DMCs are currently indexing record backlogs, cleaning up databases, and performing shelf-to-index inventories. The ER Central DMC facility is not fully in compliance with the stringent NQA-1, Supplement 17S-1, which are single record copy storage requirements. However, until the implementation of a storage medium other than paper, the project file copy maintained at the satellite centers will comply with the dual record storage option. Additionally, a quality assurance (QA) records system will be designed, implemented, and enforced. To avoid duplication of effort, QA records will be defined as ER required records. The following are other issues currently being addressed:

- development of a standard and controlled documents distribution;
- development of a D&D records management system; and
- development of CERCLA and D&D project file guides.

2.3.3 ER Program/Site Specific Requirements

ER Program and site-specific requirements are not regulatory driven but critical to the successful implementation of the ER IRM Program. ER IRM must have the capability to store and retrieve program- and site-specific information in a variety of formats to enable ER personnel to meet reporting requirements. This will be accomplished through by utilizing an information management system that provides accurate, timely information needed to support decision making processes. This program area must stay abreast of ER Program developments and implement systems that are flexible enough to meet program requirements as functions and priorities evolve over time.

3. INFORMATION RESOURCE MANAGEMENT FY 1995 WORK PLAN

3.1 BACKGROUND

The ER IRM was chartered in April 1993 to consolidate all DOE-ORO ER records activities and more effectively and efficiently manage the records associated with ER operations. It was determined that AR activities, previously under the FFA implementation group, would also be merged with this program. The AR is a mature program recognized favorably by DOE-ORO and the regulatory community, and operational excellence will be maintained. However, the immediate program emphasis will focus on developing records and information management systems.

The concept of a single records and information system supporting all DOE-ORO ER records activities is a challenging task. A logical implementation strategy was developed based on process development, implementation requirements, and priority of the tasks. Development of a model Energy Systems ER Program records management and document control system and supporting procedures has been identified as the top priority. Successful completion of this task would position Energy Systems, integrating contractor, to issue standard guidance to subcontractors and other DOE-ORO ER prime contractors. While developing this model, investigations will begin to define requirements for and identify an electronic information system to effectively process the records produced by the ER Program, validate our past operations, and provide a management tool for ER personnel today and in the future.

3.2 ACCOMPLISHMENTS

Since program creation and the development of this program plan, implementation of the ER IRM Program has significantly progressed. To date, the ER IRM Program has accomplished the following:

- developed a management system organizational infrastructure;
- developed roles and responsibilities and job descriptions;
- consolidated ER records management activities;
- received favorable DOE-ORO ER Program review (August 1993);
- developed the draft CERCLA Project File Guide;
- implemented 90% of DMC networking;
- completed DOE records inventory of all ER Program records;
- initiated the investigation of a cradle-to-grave electronic information management system;
- established support services Memorandum of Understanding with former Information Services Division;
- acquired K-1002 building (~ 7000 sq ft) for ER Central DMC operations;

- revised Chap. 4, "Documents and Records," of the ER Quality Program Plan, ES/ER/TM-4/R4, to reflect current operations.

3.3 FY 1995 TASKS

Listed below are actions scheduled for development and implementation in FY 1995. Completion of these tasks will establish the framework for a comprehensive records management program. These actions have been integrated with the DOE-ORO Data Quality Investigation (DQI) initiative and were approved by the DQI Steering Committee in August 1994.

- Issue an ER IRM Program plan which documents requirements, organizational structures, roles and responsibilities, WBS, and established a baseline against which overall performance shall be measured. Scheduled completion date: September 30, 1994.
- Establish a records management and document control programmatic compliance baseline of requirements by functional area, and integrate ER IRM organizational infrastructure with the ER requirements flowdown system and the ERWM Compliance Management Program. The scheduled completion date is March 3, 1995.
- Develop program level implementation procedures as defined in the requirements flowdown assessment and document acceptance of/exemption from any requirement units. The scheduled completion date is December 30, 1994.
- Develop system requirements documentation and perform vendor analysis on electronic work flow software available to electronically manage ER records throughout their life cycle. The scheduled completion date is March 15, 1995.
- Establish a training module that schedules and documents training required for and administered to records, site, subcontractor, and prime contractor personnel. The scheduled completion date is June 30, 1995.
- Establish an assessment module that ensures and documents compliance with ER functional record procedures and requirements. The scheduled completion date is September 30, 1995.
- Develop and issue an ER integrating contractor standard extending ER records management and document control requirements to all DOE-ORO ER prime contractors. The scheduled completion date is April 21, 1996.

3.4 SCHEDULES AND MILESTONES

AR activities are initiated and scheduled according to the negotiated regulatory milestones documented in the FFA, Appendix E. Deliverables associated with the records management and document control area are detailed in Sect. 3.3. of this plan.

3.5 TECHNICAL PERFORMANCE CRITERIA

Technical performance criteria used to assess regulatory performance of ER IRM activities are outlined in Sect. 2.3 of this plan. Section 3.3 provides key performance measures for assessing the effectiveness of this program. In addition, overall DOE-ORO ER and ER Program customer satisfaction also serve as critical technical performance criteria.

3.6 INFORMATION AND REPORTING

Information concerning the current status, schedules, activities, or budget of the ER IRM Program can be obtained by contacting the ER IRM program manager. The ER IRM submits weekly highlights to the ER Program, provides input to the FFA quarterly report, and prepares and submits all required budgetary documentation under the management system.

4. WORK BREAKDOWN STRUCTURE

Figure 5 illustrates the WBS chart for the ER IRM Program under activity data sheet 8304.

The comprehensive WBS for the ER IRM will serve as the framework for planning, assignment of responsibilities, technical baseline, schedule control, cost summaries, and change control. The ER IRM Program management levels listed below provide a logical summary point for assessing technical accomplishments, identifying the funding requirements, and measuring cost and schedule performance.

- Administrative Record,
- Program Administration,
- Information Systems,
- Records Management and Document Control, and
- Central DMC Operations.

4.1 ADMINISTRATIVE RECORD—1.4.12.3.04.14.01

This activity provides for the management and coordination of AR requirements and activities established in the above specified procedures to ensure compliant and consistent implementation of ARs and AR files. The AR staff develops and updates AR file criteria; establishes AR files as required and contemporaneously assigns materials for inclusion into on-site AR files; verifies or coordinates document clearance; provides basic indexing information; properly labels and transmits appropriate AR file materials to the off-site AR file managed by the DOE technical support contractor for public review; coordinates STARR meetings; and ensures AR finalization and protection.

4.2 PROGRAM ADMINISTRATION—1.4.12.2.3.04.14.02

This activity administers overall program management and direction and coordination for technical consistency of strategy and methodologies used to address ER IRM activities. This activity develops short- and long-range plans and associated budget proposals; interacts with senior management, DOE, and regulatory agencies for communication of technical information; develops budgets, including current year work plans and baselines; tracks progress and evaluation; analyzes variance and reporting; attends ER, Compliance and Risk Integration, and DOE meetings; maintains staffing resource requirements; and prioritizes work.

4.3 INFORMATION SYSTEMS—1.4.12.2.3.0.14.03

This activity tracks the development of system requirements, analysis of technology solutions, and pilot and full-scale implementation of automated systems that manage

Fig. 5. Work breakdown structure for the Environmental Restoration Information Resource Management Program.

Program information from "cradle to grave;" ensures that automated information systems are designed to meet program recordkeeping requirements by defining and reviewing requirements; and provides platform for comprehensive DOE-ORO ER records system.

4.4 RECORDS MANAGEMENT AND DOCUMENT CONTROL— 1.4.12.2.3.04.14.04

This activity provides for the development of a records management and document control system and the appropriate implementation procedures for ER records based on established flowdown requirements; ensures compliance and integration to Energy Systems divisional records policies; establishes document centers to both capture and make accessible ER records throughout their life cycle.

4.5 CENTRAL DMC OPERATIONS—1.4.12.2.3.04.14.05

This activity provides for the centralized maintenance of ER record copies to include indexing, storage, control, and retrieval of records; serves as focal point of satellite activities; maintains ER controlled documents in the Controlled Document Management System; performs distribution of ER documents and reports; participates in and responds to audits.

APPENDIX

Information Resource Management Program Plan Tables 1 through 3

Table 1. CERCLA Administrative Record requirements

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.800 Establishment of an administrative record. Paragraph (a)	Complete	<i>General Requirement.</i> The lead agency shall establish an administrative record that contains the documents that form the basis for the selection of a response action. The lead agency shall compile and maintain the administrative record in accordance with this subpart.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.800 Establishment of an administrative record. Paragraph (b)	Complete	<i>Administrative Records for federal facilities.</i> (1) If a federal agency other than EPA is the lead agency for a federal facility, the federal agency shall compile and maintain the administrative record for the selection of the response action for that facility in accordance with this subpart. EPA may furnish documents which the federal agency shall place in the administrative record file to ensure that the administrative record includes all documents that form the basis for the selection of the response action. (2) EPA or the U.S. Coast Guard shall compile and maintain the administrative record when it is the lead agency for a federal facility. (3) If EPA is involved in the selection of the response action at a federal facility on the National Priorities List, the federal agency acting as the lead agency shall provide EPA with a copy of the index of documents included in the administrative record file, the RI/FS (remedial investigation/feasibility study) work plan, the RI/FS released for public comment, the proposed plan, and public comments received on the RI/FS and proposed plan, and any other documents EPA may request on a case-by-case basis.

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.800 Establishment of an administrative record. Paragraph (c), 1st and 3rd Sentences	Complete	<i>Administrative record for state-lead sites.</i> If a state is the lead agency for a site, the state shall compile and maintain the administrative record for the selection of the response action for that site in accordance with this subpart. The state shall provide EPA with a copy of the index of documents included in the administrative record file, the RI/FS work plan, the RI/FS released for public comment, the proposed plan, any public comments received on the RI/FS and proposed plan, and any other documents EPA may request on the case-by-case basis.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.800 Establishment of an administrative record. Paragraph (e)	Complete	For those response actions not included in paragraph (d) of this section, the lead agency shall comply with this subpart to the extent practicable.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.805 Establishment of an administrative record. Paragraph (a)	Complete	The lead agency shall establish a docket at an office of the lead agency or other central location at which documents included in the administrative record file shall be located and a copy of the documents included in the administrative record file shall also be made available for public inspection at or near the site at issue, except as provided below: (4) Documents included in the confidential portion of the administrative record file shall be located only in the central location.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.805 Location of the administrative record file. Paragraph (b)	Complete	Where documents are placed in the central location but not in the file located at or near the site, such documents shall be added to the file located at or near the site upon request, except for documents included in paragraph (a)(4) of this section.

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.810 Contents of the administrative record file. Paragraph (a)	Complete	<i>Contents.</i> The administrative record file for selection of a response action typically, but not in all cases, will contain the following types of documents: (1) Documents containing factual information, data and analysis of the factual information, and data that may form a basis for the selection of the response action.... (2) Guidance documents, technical literature, and site-specific policy memoranda that may form a basis for the selection of the response action.... (3) Documents received, published, or made available to the public under §300.815 for remedial actions, or §300.820 for removal actions.... (4) Decision documents.... (5) Enforcement orders.... (6) An index of the documents included in the administrative record file...
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.810 Contents of the administrative record file. Paragraph (b), 1st Sentence	Complete	<i>Documents not included in the administrative record file.</i> The lead agency is not required to include documents in the administrative record file which do not form a basis for the selection of the response action.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.810 Contents of the administrative record file. Paragraph (c), 1st Sentence	Complete	<i>Privileged documents.</i> Privileged documents shall not be included in the record file except as provided in paragraph (d) of this section or where such privilege is waived.

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.810 Contents of the administrative record file. Paragraph (d)	Complete	<i>Confidential file.</i> If information which forms the basis for the selection of a response action is included only in a document containing confidential or privileged information and is not otherwise available to the public, the information, to the extent feasible, shall be summarized in such a way as to make it disclosable and the summary shall be placed in the publicly available portion of the administrative record file. The confidential or privileged document itself shall be placed in the confidential portion of the administrative record file. If information, such as confidential business information, cannot be summarized in a disclosable manner, the information shall be placed only in the confidential portion of the administrative record file. All documents contained in the confidential portion of the administrative record file shall be listed in the index to the file.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.815 Administrative record file for a remedial action. Paragraph (a)	Complete	The administrative record file for the selection of a remedial action shall be made available for public inspection at the commencement of the remedial investigation phase. At such time, the lead agency shall publish in a major local newspaper of general circulation a notice of the availability of the administrative record file.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.815 Administrative record file for a remedial action. Paragraph (b), 1st and 3rd Sentences	Complete	The lead agency shall provide a public comment period as specified in §300.430(f)(3) so that interested persons may submit comments on the selection of the remedial action for inclusion in the administrative record file. A written response to significant comments submitted during the public comment period shall be included in the administrative record file.

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.815 Administrative record file for a remedial action. Paragraph (c)	Complete	The lead agency shall comply with the public participation procedures required in §300.430(f)(3) and shall document such compliance in the administrative record.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.815 Administrative record file for a remedial action. Paragraph (d)	Complete	Documents generated or received after the record of decision is signed shall be added to the administrative record file only as provided in §300.825.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.820 Administrative record file for a removal action. Paragraph (a)	Complete	<p>If, based on the site evaluation, the lead agency determines that a removal action is appropriate and that a planning period of at least six months exists before on-site removal activities must be initiated:</p> <p>(1) The administrative record file shall be made available for public inspection when the engineering evaluation/cost analysis is made available for public comment. At such time, the lead agency shall public in a major local newspaper of general circulation a notice of the availability of the administrative record file.</p> <p>(2) The lead agency shall provide a public comment period as specified in §300.415 so that interested persons may submit comments on the selection of the removal action for inclusion in the administrative record file . . . A written response to significant comments submitted during the public comment period shall be included in the administrative record file.</p> <p>(3) The lead agency shall comply with the public participation procedures of §300.415(m) and shall document compliance with §300.415(m)(3)(i) through (iii) in the administrative record file.</p> <p>(4) Documents generated or received after the decision document is signed shall be added to the administrative record file only as provided in §300.825.</p>

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.820 Administrative record file for a removal action. Paragraph (b)	Complete	For all removal actions not included in paragraph (a) of this section: (1) Documents included in the administrative record file shall be made available for public inspection no later than 60 days after initiation of on-site removal activity. At such time, the lead agency shall publish in a major local newspaper of general circulation a notice of availability of the administrative record file. (2) The lead agency shall, as appropriate, provide a public comment period of not less than 30 days beginning at the time the administrative record file is made available to the public....A written response to significant comments submitted during the public comment period shall be included in the administrative record file. (3) Documents generated or received after the decision document is signed shall be added to the administrative record file only as provided in §300.825.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.825 Record requirements after the decision document is signed. Paragraph (a)	Complete	(2) An explanation of significant differences required by §300.435(c), or an amended decision document is issued, in which case, the explanation of significant differences or amended decision document and all documents that form the basis for the decision to modify the response action shall be added to the administrative record file.
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.825 Record requirements after the decision document is signed. Paragraph (b), 2nd and 3rd Sentences	Complete	Such comment shall be limited to the issues for which the lead agency has requested additional comment. All additional comments submitted during such comment periods that are responsive to the request, and any response to these comments, along with documents supporting the request and any final decision with respect to the issue, shall be placed in the administrative record file.

Table 1 (continued)

Administrative and technical basis			Administrative Record ER/S-1505, Rev.0 (12/14/92) and ER/P-1506, Rev. 0 (04/06/93)
Requirement document	Section/paragraph	Flowdown status	Requirement unit
40 CFR 300, Subpart I - Administrative Record for Selection of Response Action	300.825 Records requirements after the decision document is signed. Paragraph (c)	Complete	The lead agency required to consider comments submitted by interested persons after the close of the public comment period only to the extent that the comments contain significant information not contained elsewhere in the administrative record file which could not have been submitted during the public comment period and which substantially support the need to significantly alter the response action. All such comments and any responses thereto shall be placed in the administrative record file.

**Table 2. DOE-ORO ER Program and Energy Systems records management and document control requirement units
(IO-101, Records Management, Rev. 2)**

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE 1324.5A, 4/30/92 Records Management Program Para 8a	Energy Systems Records Manager and Site Records Managers are in place.	Complete	The site (DOE or contractor) manager will assure that a management official knowledgeable in records management policy, methods, and practices is designated as the records management officer. The officer may designate assistant records management officers to accomplish specific responsibilities.
1324.5A, Para 8b (1)	This procedure, site procedures and implementation plans	Complete	Develop and issue Orders that implement Departmental Orders, policies, procedures, requirements, and guidelines for the site's records management program
1324.5A, Para 8b (2)	This procedure; records management implementation plans are required for sites/major organizations	Complete	Implement and administer a records management control process to ensure that records management program requirements are properly identified.
1324.5A, Para 8b (3)	Appendix B-4; Also, annual Energy Systems Records Management Plan to DOE- ORO	Complete	Formulate, continually update, and review at least annually a records management plan which will allow the appropriate approving (i.e., site management) or reviewing authorities (e.g., a DOE Field Office) to judge the comprehensiveness and effectiveness of the records management program.
1324.5A, Para 8b (4)	Appendix B-4; Also, 1324.5A Implementation Plan	Complete	Ensure that plans are developed and implemented for conducting continuous records management awareness and training to assure that DOE and contractor personnel involved in managing, designing, developing, using, and maintaining records systems are kept aware of new requirements, and are trained in techniques to implement them.
1324.5A, Para 8b (5)	C-10, 11, 15 Appendix B-3	Complete	Ensure that all records, especially those having lengthy retention requirements, are provided protection in accordance with requirements to preserve them free of environmental agents or accidents that may cause deterioration or loss.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.5A, Para 8b (6)	Appendix B-3	Complete	Ensure that records are not stored in DOE records storage facilities for more than 20 years without National Archives and Records Administration (NARA) approval.
1324.5A, Para 8b (7)	D-1, Appendix B-3	Complete	Ensure that site-specific records retention and disposition schedules are developed, approved, and implemented.
1324.5A, Para 8b (8)	Appendix B-3	Complete; using graded approach	Ensure that records storage facilities meet the requirements of NARA as provided in 36 CFR 1228.222.
1324.5A, Para 8b (9)	C-10, Appendix B-2	Complete	Develop and implement a process for institutionalizing a disaster recovery plan to ensure protection and preservation of records in the event of a disaster. The plan should be based on an appropriate risk assessment process commensurate with the risk of loss and value of the records.
1324.5A, Para 8c (1)	Whole procedure	Complete	A records management control process must ensure that the following, as a minimum, are carried out: Regulations implementing Departmental policies, procedures, and guidelines for the records management program are developed and issued.
1324.5A, Para 8c (2)	Appendix B-4	Complete	Self-assessments are conducted to determine whether or not the records management program is managed effectively and efficiently.
1324.5A, para 8c (3)	Appendix B-4	Complete	Personnel who participate in managing, designing, developing, operating, or maintaining records systems are trained to a level commensurate with the records management activity performed. Ensuring that employees know that official records may not be removed without authorization is a singularly important training objective.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.5A, Para 8c (4)	Appendix B-4	Complete	Follow-up procedures are in place to ensure implementation of recommendations from compliance reviews or that the reasons for not implementing such recommendations are documented.
1324.5A, Para 8c (5)	Appendix B-4 Implementation Plan for 1324.5A	Complete	Records management plans are approved by appropriate management officials. (see 8d for description of plan elements)
1324.5A, para 8d (1)	Appendix B-4; Direction to site/major organization records managers	Complete	A records management plan should reflect known program deficiencies; and also work efforts, actions, or projects for correcting those deficiencies in accordance with priorities and available staff. Elements that are relative to the coverage of the plan and to the environment of the site should be included, as follows: (1) Summary of the management control process describing the records management program of the site. If special provisions apply to selected records management initiatives or records holdings, this information should be included.
1324.5A, Para 8d (2)	Appendix B-4 Direction to site/major organization records managers	Complete	References to lists that uniquely identify assistant RMSs and the recordkeepers and their official file stations.
1324.5A, Para 8d (3)	Appendix B-4 Direction to site/major organization records managers	Complete	Reference to schedules indicating any type of self-assessments. Schedules should, at a minimum, indicate the fiscal year planned for such tasks.
1324.5A, Para 8d (4)	Appendix B-4 Directive to site/major organization records managers	Complete	Reference to documents containing the results of the latest compliance review and follow-up actions on previous recommendations from the review.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.5A, Para 8d (5)	Appendix B-4 Direction to site/major organization records managers	Complete	Reference to a plan for continually providing records management program awareness and training to personnel who manage, design, develop, operate, maintain, or use records management. Plans for on-site personnel should include, as a minimum, training schedule, type of training, personnel attending, and date of attendance.
1324.5A, Para 8d (6)	Appendixes B-4, C-3 Direction to site/major organization records managers	Complete	Reference to lists which identify emergency response personnel and locations where they may be contacted.
OR 1324.5, 4/88, Records Management Program	N/A	N/A	General: This order assigns OR responsibilities for implementing DOE 1324.5.
DOE Order 1324.6, 7/8/87, Automated Office Electronic Recordkeeping 7a, Legal Requirements	B-1,2; A-1,2,3; Appendix C-5	Complete NOTE: Requirements for Electronic Records in procedure text were taken from 36CFR, Chap. XII.1234, which is more current	Agency heads are required to make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Gov. and of persons directly affected by the agency's activities.
1324.6, Para 8	Appendix C-5;	Complete	Records officers and all other personnel relying on electronic recordkeeping shall provide for cost effective, adequate, and proper documentation of Departmental functions, activities, and operations; access and usage controls to prevent unauthorized access to loss of, removal of, or theft of Departmental records created or acquired in electronic form; and that all records in electronic form have authorized disposition in accordance with 1324.2.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.6, Para 9b	Appendix C-5	Complete	Personnel shall provide accurate and specific external labels for disks and diskettes. External labels shall include: title, dates, software, and file code and identification of the equipment on which the records were created.
1324.6, Para 9c	Appendix C-5	Complete	Personnel shall use readily understandable and standard internal document labels so that they, their colleagues, and their successors can retrieve electronically stored information.
1324.6, Para 10a	Appendix C-5	Complete	Subject filed electronic records shall be coded in accordance with DOE 0000.1A or its contractor equivalent. Every flexible disk shall be labeled. Every document shall be coded, named, dated, and described accurately and in sufficient detail to permit its retrieval.
1324.6, Para 10b	Appendix C-5	Complete	Case filed electronic records shall be indexed. (1) Include such things as date, subject, sender, receiver, and number (case contract, purchase order, and so forth). (2) Diskette indexes should be printed out to ensure easy access.
1324.6, Para 11b	Appendix C-5 Appendix B-3	Complete	Retrieving Electronically Stored Records. Permanent records that are to be transferred to NARA and are stored on disks or diskettes shall be converted either to magnetic tape (36 CFR 1228.188 formerly Federal Property Management Regulation (FPMR) subpart 101-11.411-6) or converted to paper or microform. (Microforms should meet the standards in 36 CFR part 1230, formerly FPMR subpart 101-11.5) Submit through channels, DOE F 1324.5, Records Retention and Disposal Authorization, to obtain disposition authorization.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.6, Para 12d	Appendix C-5	Complete	Ensuring the Retention of Records. Since many electronic mail systems automatically erase information after the recipient has read it, personnel shall take positive action at the time they receive electronic messages to retain any record received in this manner and transfer it to a medium which will satisfactorily store the record until its disposition date.
1324.6, Para 12e	B-3; Appendix C-5	Complete	If the Same information is contained on more than one medium (such as paper and disk), the disposition of the records on both media shall be scheduled.
1324.6, Para 13a	Appendix C-5 Appendix B-3	Complete	Electronic records can only be destroyed according to an authorization. Authorized records retention standards and procedures for obtaining approval of new standards for records not presently covered are contained in DOE 1324.2.
1324.6, Para 13b	N/A	N/A. DOE Orders 1360.2, 5636.2, and 5636.4 are cancelled and out of date. Assessment completed by Ron Marcum, Computer Security	Requirements for transmitting, storing, disposing, and protecting security classified or sensitive unclassified records are contained in DOE 1360.2, 5632.4, 5635.1, 5636.2, and 5636.4.

Table 2 (continued)

Administrative and technical basis			Level 1 document number	IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments	
1324.6, Para 13c-2	Appendix C-5 refers user back to computer security	N/A Guidance is seriously outdated. Energy Systems is compliant with the intent of DOE Order 5637.1. Assessment completed by Ron Marcum, Computer Security	Before destroying any classified or sensitive unclassified records, consult either the computer security operations manager or the computer protection program manager for the approved method of erasure or destruction. Only by degaussing with an approved device, or by using a program that writes an alternating pattern of zeros and ones over the data to be erased can positive protection be obtained that will prevent unauthorized access to the information approved for destruction. Therefore, to ensure the destruction of security classified or sensitive unclassified electronic records, this procedure is repeated several times to erase disks or tapes rather than have the system delete them.	
1324.6, Para 14b	Appendix C-5	Partial Present system cannot support	If the only record is electronic, procedures shall be established so that (1) the date of the record can be determined, (2) the date of any alterations will be automatically recorded by the system, and (3) it will be evident that the document was authorized to be issued (signed) by an appropriate Departmental official.	
1324.6, Para 15	Appendix C-5	Complete	Ensure the safekeeping of electronically stored data utilizing the considerations set forth in this section of the Order.	

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.6, Para 15e	N/A	N/A This section is derived from an out of date order. Energy Systems is in compliance with the replacement order. Assessment completed by Ron Marcum, Computer Security.	Unclassified, sensitive electronic records shall not be processed without the express written approval of the Computer Protection Program Manager in accordance with DOE 1360.2. Consult him or her for any specific requirements for processing unclassified data or applications, e.g., color coded or specially marked diskettes. In addition, the Computer Protection Program Manager must certify "that new or significantly changed sensitive computer applications are design reviewed and system tested prior to operational use...Upon successful completion of the system test, the Computer Protection Program Manager shall certify that the system meets the documented and approved system protection specification: related applicable Federal policies, regulations, and standards; and that the results of the test demonstrate that the protection provisions are adequate to safeguard the sensitive data processed."
1324.6, Para 16	Appendix C-5	Complete	Software for Electronic Systems. (c) The system must be able to accommodate the data transportability specifications for those permanent records that will be transferred to NARA (see 36 CFR 1228.188); (d) When planning a new system or revising an existing system, managers shall plan for the disposition of the electronic records in the system.
DOE Order 1324.7A, 3/26/92, Departmental History Program 8c Responsibilities	B; D-1 Appendix B-3	Complete	Summary: Assure that file custodians develop and maintain systems which facilitate the identification and preservation of records of historical value; Identify these records on DOE F 1324.10 and forward to DOE Chief Historian for review and further disposition instructions. Retire these files according to provisions in 1324.2A and HQ 1324.1A. Consult with Departmental Records Officer, as necessary, in distinguishing official records from personal papers; coordinate with Chief Historian to determine historical value of records; coordinate all history and archival projects with Chief Historian for authorization and approval.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE Order 1324.8, 10/23/91, Rights and Interests Records Protection Program Para 9	A, B; Appendix C-4	Complete; graded approach	Because it is impossible to ensure the availability of every important document, sound judgment shall be used in identifying these records.
1324.8, Para 10a	C-15; Appendixes B-3, C-4	Complete	Storage locations used shall provide adequate protection and accessibility and shall meet the risk level of fire protection required by DOE directives.
1324.8, Para 10b	C-9-15; Appendixes B-3; C-4	Complete	Records will be stored at the site in such a manner as to assure ease of access and retrieval. The site shall have the necessary capability to make the records immediately useful.
DOE Order 5480.8A, 6/26/92 (Change 1: 10/19/92), Contractor Occupational Medical Program 11 e (3)	Appendix C-1	Complete	Access to Employee Medical Records. Access to employee medical records shall be in accordance with: a) the Privacy Act as codified in 10 CFR 1008.17(b)(1); and b) "Access to Exposure and Medical Records" as codified in 29 CFR 1910.20 (OSHA Standard).
5480.8A 11 e 6)	D; Appendixes C-1	Complete	Retention of Medical Records. All employee health records shall be retained in accordance with DOE 1324.2A. However, inactive records may be retired to low-cost storage in an on-site records holding area or a Federal Records Center (FRC). To protect the confidentiality of the records, the shipping cartons shall be sealed and the transfer documents shall note that access to the records is limited to personnel of the Contractor Medical Department. If resources are available, the files may be microfilmed and the paper records destroyed.
DOE Order 5500.7B, 10/23/91, Emergency Operating Records Protection Program Para 10 [1]	B; Appendix C-3	Complete; graded approach	Because it is impossible to ensure the availability of every important document, sound judgment shall be used in identifying emergency operating records.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
5500.7B, Para 10 [3]	Appendix C-3	Complete	Official record copies shall not be used.
5500.7B, Para 11a	Appendix C-3	Complete	Emergency Operating Centers (EOCs) and relocation sites, as developed, shall provide adequate protection and accessibility, and shall meet the improved risk level of fire protection required by DOE 5480.7 . Storage of classified documents at these sites shall be approved in accordance with DOE 5634.1A prior to use.
5500.7B, Para 11b	Appendix C-3	Complete	Records will be stored at the site in such a manner as to ensure ease of access, retrieval, and control. The site will have the necessary capability to make the records immediately available. Classified records shall be handled in accordance with DOE 5632.5 and DOE 5635.1A. UCNI records will be controlled in accordance with DOE 5635.4.
5500.7B, Para 11c	Appendix C-3	Complete	Emergency Operating records shall be maintained until they are superseded or replaced. Once superseded, these records revert to standard records disposition requirements.
DOE Order 5700.6C, 8/21/91, Quality Assurance Para 9b (1), Criterion 4	A, B, C, D Appendix B	Complete	Records shall be specified, prepared, reviewed, approved, and maintained.
DOE Order 5700.6C, 8/21/91, Attachment I, 4 b (1)	A, B, C, D, E Appendixes B,C	Complete	A process should be established and implemented to ensure that sufficient records (for example, records of design, environmental conditions, applied research and development, procurement, construction, data acquisition, assessments, inspection, testing, maintenance, and modification) are specified, prepared, reviewed, approved, and maintained to accurately reflect completed work. The maintenance of records should include provisions for retention, protection, preservation, traceability, accountability, and retrievability.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE Order 5700.6C, 8/21/91, Attachment I, 4 b (2)	Appendix C-5,6,7,8,9	Complete	For records that require special processing and control, such as computer codes or information on high density media or optical disks, hardware and software required to maintain and access records should be controlled to ensure records are usable.
DOE Order 5700.6C, 8/21/91, Attachment I, 4 b (3)	C-9,14,15; D-1; Appendix B-3	Complete	Records holding facilities are reserved for storage of inactive records and may not meet the physical requirements or have appropriate staff to maintain active records. Active records requiring special handling, storage, and processing should not be sent to records holding facilities. Users should refer to the General Records Schedule (GRS) or DOE 1324.2A for retention and disposition of records.
DOE Order 5700.6C, 8/21/91, Attachment I, 4 b (4-5)	Appendix B-3 (H-L)	Complete	(4) NARA exercises final authority for approving the disposition of Govt. records. Use of the GRS and DOE Records Schedule (DOERS) is mandatory. (5)...Care should be taken to follow requirements of both NARA and standards offering interpretive QA guidance but using different terminology.
ASME NQA-1, Basic Requirements, 1989, 17, Quality Assurance Records	A; B; D;C; Appendix B	Complete	Records that furnish documentary evidence of quality shall be specified, prepared, and maintained. Records shall be legible, identifiable, and retrievable; protected against damage, deterioration, or loss. Requirements and responsibilities for record transmittal, distribution, retention, maintenance, disposition shall be established and documented.
ASME NQA-1-1989, Supplement 17S-1 2.1, Records System	A, B, C, D; Appendix B	Complete	A records system(s) shall be established by the organization responsible at the earliest practicable time consistent with the schedule for accomplishing work activities and in compliance with the general requirements of this Supplement. The records system(s) shall be defined, implemented, and enforced in accordance with written procedures, instructions, or other documentation.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, 17S-1 2.2 Generation of Records	A; B; C, D Appendix B	Complete	The applicable design specifications, procurement documents, test procedures, operational procedures, or other documents shall specify the records to be generated, supplied, or maintained by or for the Owner. Documents that are designated to become records shall be legible, accurate, and completed appropriate to the work accomplished.
NQA-1, 17S-1 2.3 Record Validation	C-2; Appendix D	Complete	Documents shall be considered valid records only if stamped, initialed, or signed and dated by authorized personnel or otherwise authenticated. This authentication may take the form of a statement by the responsible individual or organization. Handwritten signatures are not required if the document is clearly identified as a statement by the reporting individual or organization. These records may be originals or reproduced copies.
NQA-1, 17S-1 2.4 Index	C-3; Appendix B-2,3	Complete	The records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the record within the record system.
NQA-1, 17S-1 2.5 Distribution	Procedure	Complete	The records shall be distributed, handled, and controlled in accordance with written procedures.
NQA-1, 17S-1 2.6 Identification	C-3; Appendix B-2	Complete	Records and/or indexing system(s) shall provide sufficient information to permit identification between the record and the item(s) or activities to which it applies.
NQA-1, 17S-1 2.7 Classification	B-5; Appendixes B-1, D	Complete	Records shall be classified as Lifetime or Nonpermanent by the Owner, or his agent when authorized in accordance with the criteria given in paras. 2.7.1 and 2.7.2 below.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, 17S-1 2.7.1 Lifetime Records	B-5; Appendixes B-1, D	Complete	Lifetime records are those that meet one or more of the following criteria: (a) would be of significant value in demonstrating capability for safe operation; (b) would be of significant value in maintaining, reworking, repairing, replacing or modifying an item; (c) would be of significant value in determining the cause of an accident or malfunction of an item; (d) would provide required baseline data for in-service inspections. Lifetime records are required to be maintained by or for the plant owner for the life of the particular item while it is installed in the plant or stored for future use.
NQA-1, 17S-1 2.7.2 Nonpermanent Records	B-5; Appendixes B-1, D	Complete	Nonpermanent records are those required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item because they do not meet the criteria for lifetime records.
NQA-1, 17S-1 2.8 Retention of Records	D-1; Appendix B-3	Complete	Records shall be retained in accordance with the above classifications. The retention period for nonpermanent records shall be established in writing.
NQA-1, 17S-1 2.9 Corrected Information in Records	C-1; Appendix B-2	Complete	Records may be corrected in accordance with procedures which provide for appropriate review or approval by the originating organization. The correction shall include the date and the identification of the person authorized to issue such correction.
NQA-1, 17S-1 3.1 Receipt Responsibility	C-12	Complete	The individual or organization responsible for receiving records shall provide protection from damage or loss during the time that the records are in their possession.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, 17S-1 3.2 Receipt Control	C-12, 13,14; Appendix B-2,3	Complete	Each organization responsible for the receipt of records shall designate a person or organization responsible for receiving the records. The designee shall be responsible for organizing and implementing a system of receipt control of records for permanent and temporary storage. As a minimum, a receipt control system shall include the following: (a) a method for designating the required records; (b) a method for identifying records received; (c) procedure for receipt and inspection of incoming records; (d) a method for submittal of completed records to the storage facility without unnecessary delay.
NQA-1, 17S-1 3.3 Status	C-12	Complete	Each receipt control system shall be structured to permit a current and accurate assessment of the status of records during the receiving process.
NQA-1, 17S-1 4.1 Storage	C; Appendixes B-2, 3	Complete	The records shall be stored in predetermined locations that meet the requirements of applicable standards, codes, and regulatory agencies. Prior to storage of records, a written storage procedure shall be prepared and responsibility assigned for enforcing the requirements. It shall include, as a minimum, a-g: (a) description of storage facility; (b) filing system to be used; (c) method for verifying records received agree with transmittal document and are legible; (d) method for verifying records are those designated (3.2); (e) rules governing access to and control of files; (f) method for maintaining control of and accountability for records removed from the storage facility; (g) method for filing supplemental information (2.9) and disposing of superseded records.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, 17S-1 4.2 Preservation	C- 9--15 Appendixes B-2,3; C-5--9	Complete	Records shall be stored in a manner approved by the organization or organizations responsible for storage. In order to preclude deterioration of the records the requirements of a-c shall apply: (a) Provisions shall be made in the storage arrangement to prevent damage from moisture, temperature, and pressure. (b) Records shall be firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets. (c) Provisions shall be made for special process records (such as radiographs, photographs, negatives, microform, and magnetic media) to prevent damage from excessive light, stacking, electromagnetic fields, temperature, and humidity.
NQA-1, 17S-1 4.3 Safekeeping	C- 4--6, 13; Appendix B-3	Complete	Measures shall be established to preclude the entry of unauthorized personnel into the storage area. These measures shall guard against larceny and vandalism. Measures shall be taken to provide for replacement, restoration, or substitution of lost or damaged records.
NQA-1, 17S-1 4.4 Facility	Appendix B-3	Complete	Records shall be stored in facilities constructed and maintained in a manner which minimizes the risk of damage or destruction from the following: (a) natural disasters such as winds, floods, or fires; (b) environmental conditions such as high and low temperatures and humidity; (c) infestation of insects, mold, or rodents. There are two satisfactory methods of providing storage facilities: single or dual. See Sections 4.4.1 - 4.4.4 for details.
NQA-1, 17S-1 5 Retrieval	Appendix B-3	Partial	Storage systems shall provide for retrieval of information in accordance with planned retrieval times based upon the record type. A list shall be maintained designating those personnel who shall have access to the files. Records maintained by a Supplier at his facility or other location shall be accessible to the Purchaser or his designated alternate.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, 17S-1 6 Disposition	A-3; C-9,12,14; Appendix B-1,3	Partial	Records accumulated at various locations, prior to transfer shall be made accessible to the Owner directly or through the procuring organization. The custodian shall inventory the submittals, acknowledge receipt, and process these records in accordance with this Standard. Various regulatory agencies have requirements concerning records that are within the scope of this Standard. The most stringent requirements shall be used in determining the final disposition. the Supplier's nonpermanent records shall not be disposed of until the applicable conditions listed in a-e are satisfied: (a) items are released for shipment, a Code Data Report is signed, or a Code Symbol Stamp is affixed; (b) regulatory requirements are satisfied; (c) operational status permits; (d) warranty consideration is satisfied; (e) Purchaser's requirements are satisfied.
DOE Order 1324.4, 11/2/83, Micrographics Management Section 8a-b	Appendix C-6	Complete; requirements for Appendix C-6 came from 36 CFR XII, 1230	Summary: In accordance with FPMR Section 101-11.505, Micrographics Systems Analysis, conduct a system analysis (including cost/benefit) prior to decision to establish a new or significant enhancement to a micrographic system.
1324.4, 9a	Appendix C-6	Complete	Microfilm copies (made in compliance with regulations) to serve as approved substitutes for original records destroyed in accordance with official authorizations shall have the same effect as the originals, and shall be treated as originals for the purpose of admissibility in evidence (Title 44 USC, Sect. 3312; Title 44 USC Sect. 2112). Conversion of documents, data, or information to a microform medium does not imply any change in requirements to comply with the provisions of the Privacy Act of 1974.
OR 1324.4A, 12/5/84, Micrographics Management Section 5b	Appendix B-4	Complete	Comply with provisions of DOE 1324.4A. (3) Develop and maintain accurate and complete perpetual inventories of micrographics production, reproduction, and display equipment.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE 1324.2A, 9/13/88, Records Disposition Chap I, 2a	Appendix B-3 Inventory Action Plan	Complete	The first step in the disposition process is to inventory the files (both record and nonrecord) in the organization.
1324.2A Chap I, 2b	Appendix B-3 Also Inventory Action Plan	Complete; Energy Systems Records Inventory and Disposition Schedule (RIDS) IDS database prints out info in correct format	DOE F 1324.10, "Records Inventory and Disposition Schedule," is used to document the inventory. The blocks on the form pertaining to disposition are completed later.
1324.2A Chap I, 3	Appendix B-3 Also Inventory Action Plan	Complete	The completed inventory is reviewed to determine the proper disposition authority for each filing series.
1324.2A, Chap I, 3a	Appendix B-3 Also Inventory Action Plan	Complete	Dispose of nonrecord material when no longer needed.
1324.2A, Chap I, 3b	Appendix B-3 Also Inventory Action Plan	Complete	Record material covered by GRS or DOERS. Compare filing series with item descriptions in the schedules. Where they match closely enough to determine coverage, the schedule and item number are indicated in block 7 of DOE F 1324.10.
1324.2A Chap I, 3c	Appendix IB-3 Also Inventory Action Plan	Complete	Record material not covered by existing schedules. DOE F 1324.5, "Request for Records Disposition Authority must be completed and submitted through the appropriate records officers to MA-213.3.
1324.2A Chap I, 4	Appendix B-3 Inventory Action Plan	Complete	Management Plans. DOE and contractor organizations must assure all their records are inventoried and inventories kept current. Planning for disposition must not be delayed waiting for completion of the inventory of all records. The annual records management plan must balance inventory and disposition efforts to maximize benefits.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap I, 5	D; Appendix B-3 Also Inventory Action Plan	Complete	Disposition actions include removing noncurrent files from high-cost office space to local records holding areas and/or direct to the servicing FRC; destroying records authorized under appropriate schedules; or transferring them to the National Archives for permanent storage.
1324.2A Chap I, 6a	Appendix B-3, C-5; Section D; Also Inventory Action Plan	Complete	Electronic Records. ADP/electronic, machine-readable information is included in the statutory definition of records. Such records are described separately from hard copy records. This is done by entering a separate subitem on the DOE F 1324.10 to show the filing series is also in an electronic media (e.g., tape or disk).
1324.2A Chap I, 6b	Appendix C-6	Complete	Micrographics. Each project of significant size requires a cost-benefit study to assure the project is clearly to the advantage of the Gov. when purchase of a micrographic system is contemplated. Copies have to be adequate substitutes for the hard copies they are replacing, be readable and useable for the approved retention periods of those hard copy records. Note that approval of NARA is required if the project involves microfilming of permanent records.
1324.2A Chap I, 6 c-1	Appendix B-3 Also Inventory Action Plan	Complete	Classified Records Disposal. Classified records are scheduled just like unclassified records. The disposition of accountable documents involves special effort because of security requirements. Vigorous efforts are to be made to assure compliance with disposition authorities. Nonrecord and extra copies of classified documents are promptly disposed of when no longer needed. DOE 5635.1A contains the security requirements and procedures for these documents. Classification of the records is to be indicated on the DOE F 1324.10 to aid in complying with the procedures in DOE 5635.1A.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap I, 6 d-1	Appendix B-3 Also Inventory Action Plan	Complete	Unclassified, Sensitive Information. This category of records includes Unclassified Controlled Nuclear Information (UNCI), Naval Nuclear Propulsion Information, Export Controlled Information, Official Use Only Information, and a variety of other sensitive information on which controls area placed by organizations. No attempt will be made to comply with the numerous requirements for the handling, including special markings, of these records in records holding areas or in FRCs. However, when these records are recalled by their custodial office or organization it is incumbent on that office to comply with the requirements in Departmental regulations or directives, such as DOE 5635.4. No action on these records will be taken by records personnel.
1324.2A Chap II, 2a	Appendix B-3 Also Inventory Action Plan	Complete	Inventory. The first step is to inventory the files of the organizational unit which has custody of records. This unit is identified by being a file station and by having a correspondence symbol in Departmental organizations. The management and operating contractor should use an appropriate designation. The schedule as identified in Chapter V is the key to the disposition program.
1324.2A Chap II, 2a (1)	Appendix B-3 Also Inventory Action Plan	Complete	Characteristics of a Records Inventory. (a) It must cover all records in the organizational unit. (b) Nonrecords material must be included. (c) Filing series descriptions must be clear. (d) Records must be listed by filing series (not document by document or folder by folder). (e) Location, access restrictions, file indices are placed on DOE F 1324.10.
1324.2A Chap II, 2a (2) (a)	Appendix B-3 Also Inventory Action Plan	Complete	Organizational Unit Designation. Separate RIDS are prepared for each file station.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap II, 2a (2) (b)	Appendix B-3 Also Inventory Action Plan	Complete	Organizational Unit Designation. Responsibility for files maintenance and disposition actions must be assigned to an appropriate staff member.
1324.2A Chap II, 2a (3)	Appendix B-3 Also Inventory Action Plan	Complete	Scope. The inventory covers all files of each file station and includes the following: (a) Record and nonrecord material; (b) Classified, controlled, and unclassified papers; (c) Machine-readable and microfilm records; (d) Audiovisual records; (e) Filing series and correspondence files; (f) Permanent as well as temporary records; (g) References material (pamphlets, reports, extra file copies) maintained in file equipment.
1324.2A Chap II, 2a (4) (a)	Appendix B-3 Also Inventory Action Plan	Complete	Inventory items should be descriptive of filing series, not separate forms, reports, file folders, or other papers which do no constitute filing series.
1324.2A Chap II, 2a (4) (b)	Appendix B-3 Also Inventory Action Plan	Complete	Inventory items should be limited to filing series, wherever possible. They should not be expanded to include all of the records of an activity unless all of the separate items are interfiled.
1324.2A Chap II, 2a (5) (a)	Appendix B-3 Also Inventory Action Plan	Complete	It is essential that the records in the inventory be described in terms that will be meaningful to the person who will apply the schedule.
1324.2A Chap II 2b (1) (a)	Appendix B-3 Also Inventory Action Plan	Complete	Review of Inventory. The completed inventory is reviewed to determine the proper disposition of the items described therein.
1324.2A Chap II, 2b (1) (b)	Appendix B-3 Also Inventory Action Plan	Complete	Review of Inventory. Record items in the inventory, which are covered by existing records schedules, are identified by matching the items on the inventory with appropriate records descriptions in the GRS or DOERS.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap II, 2b (2)	Appendix B-3 Also Inventory Action Plan	Complete	Use of Schedules. The GRS and DOERS apply to records in the custody of M&O contractors and the Department. The DOERS contain NARA approved disposition authorizations on records unique to DOE. When records are created which are not described in the GRS or DOERS, their creator is responsible for initiating action to obtain their authorization for disposition. The appropriate records officer should be contacted when any doubt arises on their use.
1324.2A Chap II, 2b (4) (a)	Appendix B-3; Section D Also Inventory Action Plan	Complete	The periods stated in the authorized disposition column are the minimum periods of time which records must be retained. Records may not be destroyed until after the elapse of the periods specified, or in some cases, until the occurrence of a specified event.
1324.2A Chap II, 2b (4) (b)	Appendix B-3 Also Inventory Action Plan	Complete	Occasionally, it may be necessary to establish longer or shorter periods than prescribed in the records schedules. If the criteria on which the disposition was originally based have changed, a DOE F 1324.5 should be prepared giving the reason for the change. The form is forwarded by the headquarters or field organization Records Officer to the Information Management Branch after proper coordination at the local level.
1324.2A Chap II, 2b (4) (c)	N/A	N/A	MA-213.3 will obtain NARA/other approvals. Extensions of over 1 year require HQ and NARA approvals. Such data is part of the management plan.
1324.2A Chap II, 2b (4) (d)	Appendix B-3 Also Inventory Action Plan	Complete	If Federal or State laws, or regulations issued thereunder, require specific retention periods, those periods are entered on the RIDS. This requirement shall not be construed as directing the extension of records retention standards to coincide with statutes of limitations in the various states.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap 2b (5) (a)	Appendix B-3 Also Inventory Action Plan	Complete	Each nonrecord filing series is designated on RIDS by entering "nonrecord" in column 7, Disposition Authority. If the determination of nonrecord is based on physical duplication, also indicate the office responsible for keeping the record copy.
1324.2A Chap II, 2b (5) (b)	Appendix B-3 Also Inventory Action Plan	Complete	Non record items are evaluated to determine appropriate disposal times. The disposal dates are posted in column 8 of RIDS. Nonrecord material may be disposed of without NARA or other authority.
1324.2A Chap II, 2b (6)	Appendix B-3 Also Inventory Action Plan	Complete	Filing Series Not Covered by Approved Schedules. For these filing series, new records retention standards need to be developed. The entry "to be obtained" is posted in column 7 of RIDS and "to be developed" in column 8.
1324.2A Chap II, 2b (7)	Appendix B-3 Also Inventory Action Plan	Complete	Cutoff Instructions and Retirement Periods. The completed RIDS includes a timetable for the removal of noncurrent records from office space and equipment and transfer to lower cost storage DOE facilities. This timetable provides instructions for file cutoff, retirement, transfer, or destruction. Retirement and transfer periods are developed only after the disposition is determined, since usually a significant part of each collection of records can be destroyed in the organization responsible for them. The instructions for file cutoff, retirement, transfer, or destruction are posted in column 9 of the RIDS, after which the RIDS is ready for preparation in final form, approval, and application.
1324.2A Chap II, 2c (1)	Appendix B-3 Also Inventory Action Plan	Complete	Discontinued filing series should be listed on a separate continuation sheet for removal from RIDS when all of the discontinued records have been disposed of. Likewise deferred or open items (ones for which new added authorizations are needed) may be listed on a separate sheet since that part of the RIDS is not subject to immediate application.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap II, 2c (2)	N/A	N/A	The Office of Administration Services (MA-23) prescribes the procedures for approval of RIDS at headquarters.
1324.2A Chap II, 2c (3)	Appendix B-3 Also Inventory Action Plan	Complete	Each field organization and each contractor prescribes procedures for approval of RIDS within their own organizations.
1324.2A Chap II, 2c (4)	Appendix B-3 Also Inventory Action Plan	Complete	Approvals required should be limited to organizations having a legitimate interest in the records. Approval by the Information Management Branch, MA-213.3, is not required.
1324.2A Chap II, 2c (4) (a,b)	Appendix B-3 Also Inventory Action Plan	Waiver submitted on 2c(4)(a) during Assessment. RAD maintains the master copy as a requirement of the systems development. File custodians receive a clean copy for their files.	RIDS should be prepared in at least 2 copies for distribution and use. The originals should be given to files custodians responsible for applying RIDS. One copy should be maintained by the local records officer, or other official responsible for the records disposition program of the organization. The RIDS is a key document in the records management plan.
1324.2A Chap II, 2d (1)	D-1; Appendix B-3,4 Energy Systems Directive to site/major organization records managers	Complete	The approved RIDS is the basic document in the management plan. They are to be reviewed, analyzed, and complied at records officer level, i.e., each Departmental and M&O contractor records officer will have a plan for their records management activities, based on the RIDS.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap II, 2d (2)	D; Appendix B-3 Also Inventory Action Plan	Complete	Some considerations in using RIDS: (a) Records are to be disposed of no later than 1 year from their disposal dates (b) Nonrecord material should be disposed of prior to but no later than the scheduled disposal date (c) Disposal and transfer of inactive records are accomplished on a regular basis (d) An expedited timetable is necessary if records accumulate rapidly (e) Given careful planning, actions under the management plan are scheduled as much as possible so as not to interfere with current operations.
1324.2A Chap II, 2e (1) (a)	Appendix B-3; Section D Also Inventory Action Plan	Partial	Method. Unclassified records are disposed of by maceration, shredding, landfill, burial, or by sale as waste paper. Privileged records shall be shredded, macerated or otherwise rendered illegible. Contracts for the sale of records as waste paper shall contain a provision prohibiting their resale or use as records or documents.
1324.2A Chap II, 2e (1) (b) 1	Appendix B-3; Section D-3 Also Inventory Action Plan	Complete	Method. All classified and controlled records shall be disposed of in accordance with security regulations.
1324.2A Chap II, 2e (2)	Appendix B-3 Also Inventory Action Plan	Complete	Responsibility. The responsibility for authorizing the physical disposal of records belongs to the original office of custody which is notified by the local records holding area or the FRC where the records are stored when they are eligible for disposal. At this time the original office of custody authorizes their disposal, or through the appropriate DOE records officer, justifies deferral.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap II, 2f	Section D-3; Appendix B-3 Also Inventory Action Plan	Complete	Deferred Disposal. Records pertaining to current or pending litigation and investigation, pending Freedom of Information Act matters or to exceptions taken by the General Accounting Office (GAO) shall be retained until the litigation is settled, the Freedom of Information Act matter resolved, or the GAO exception is cleared. If such cases exist, and involve records otherwise eligible for disposal, the specific records should be removed from the filing series and retained in a suspense file until the matter of controversy is settled.
1324.2A Chap III, 2	Appendix B-3 Also Inventory Action Plan	Complete	Existing Standards. The GRS and DOERS often provide practical guidance in developing disposition authorization for similar or related records. They should be used in the appraisal process to maintain consistency.
1324.2A Chap III, 4b	N/A	N/A Pertains to DOE Field Offices per RU assessment	Proposed disposition for financial records created by contractors are submitted to the GAO for concurrence.
1324.2A Chap III, 4c	Appendix B-3 Also Inventory Action Plan	Complete	All GRS dispositions are mandatory unless NARA approves an SF 115 for individual deviations.
1324.2A Chap IV, 2a	Appendix B-3 Also Inventory Action Plan; Site Record Center Procedures	Complete	Requests for reference service directed to a FRC should be made by a specific individual or designee authorized to do so by the Director of Administrative Services or Heads of Field Organizations, as appropriate. Routine requests are made in writing using Optional Form 11, "Reference Request-Federal Records Centers." Priority or emergency requests may be made by telephone or teletype. Requests must provide information such as the Records Group Number, FRC Accession Number, date(s), and descriptions of the desired records, to facilitate retrieval.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
1324.2A Chap IV, 2c	Appendix B-3 Also Inventory Action Plan	Complete	Record group numbers are assigned to Federal agencies by the Assistant Archivist for the National Archives to be used for identification and control purposes in transferring concurrent records to FRCs. The appropriate record group number must be shown in column 6(a) of the Standard Form 135 covering each transfer of records to an FRC.
1324.2A Chap IV, 2e	Appendix B-3 Also Inventory Action Plan	Complete	Coordinate with appropriate FRC to schedule those transfers.
1324.2A Chap IV, 3	Appendix B-3 Also Inventory Action Plan	Complete	Transfer to Local Records Holding Areas. HQ and Field Records Officers establish and implement transfer procedures to local records holding areas under their control.
1324.2A Chap IV, 4	Appendix B-3 Also Inventory Action Plan	Complete	Transfer to the National Archives. This transfer pertains only to permanent records, and is documented in Standard Form 258. If such transfers are under consideration, the Departmental Records Officer must be contacted for assistance and approvals.
1324.2A Chap V, 2	Appendix B-3 Also Inventory Action Plan	Complete	Citations of Authorized Dispositions. In disposition actions regarding these records, cite DOE and the schedule and item number as follows; DOE 1, 1 to reflect the authorized disposition under DOE Schedule 1, item 1. The GRS is cited the same way.
OR 1324.2B, 9/11/89, Records Disposition	Appendix B-3 Also Inventory Action Plan	Complete	General: This order assigns OR responsibilities and prescribes OR policies/procedures for the disposition of OR records.
DOE N 1324.13, 11/9/92, Disposition of Personal Papers and Official Records; Policy 6a	B-2,3; C-7; Appendix D	Complete	Summary: Sensitive classified and unclassified information (including extra copies) is the property of US Government and may not be removed from the Government's control by any agency's departing/terminated official/employee.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE Order 1322.2C, 10/22/91, Forms Management, 9b (2) (a)	Appendix B-4	Partial; current practices meet intent; Energy Systems level forms procedure under development	Establish and maintain a forms management program that complies with DOE and GSA objectives, requirements, and standards.
1322.2C, 9b (2) (b)	Appendix B-4	Complete	Designate a Forms Manager to serve as a focal point for coordination of activities pertaining to the forms management program.
1322.3C, 11/29/89, Directory of Department Forms	Appendix B-4	Most of the forms are DOE specific and would not apply to Energy Systems.	Lists Headquarters and Departmental forms approved for use by DOE.
1322.4B, 12/12/89, Directory of Standard, Optional and Other Agency Forms	Appendix B-4	Most of the forms are DOE specific and would not apply to Energy Systems.	Lists forms, other than Headquarters and Departmental, that are used by DOE
LEG-13, 6/8/92, Records Management, V. A	B; Appendixes C-3,4	Complete	In implementing its records management program, each operating element will: A. Identify, list, and protect vital records. Duplicate such records when possible.
LEG-13, V. B.	Sections A,B,C,D,E Appendixes B, C	Complete	Identify and protect company-sensitive records in accordance with applicable operating instructions and internal procedures.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
LEG-13, V. C	Appendix B-4; Implementation Plan for 1324.5A	Complete	Appoint a records manager responsible for establishing and maintaining the element's records management program, and for safeguarding all inactive records from the time they are consigned to the records center through their final disposition. Appoint records administrators responsible for controlling records for a function, department, or program.
LEG-13, V. D.	Appendix B-4	Complete	Implement programs to train new records managers and administrators, and to periodically apprise records management personnel of changes in the records management program.
LEG-13, V. E.	D-1 Appendix B-3	Complete	Develop a records retention schedule which is responsive to regulatory, Corporate, and operating element requirements, and retain records accordingly. The retention schedule must, as a minimum, include the following for each listed record: 1. Number, name and brief description. 2. Floor retention requirements and total retention requirements stated in years and/or by event (e.g., until final purchase order payment, until equipment is taken out of service, 4 years after final payment). 3. Authorization for retention: The number of the regulation, operating instruction or operating element policy or procedure which contains the retention requirements. If none of the former, the cognizant department head or designee must sign/initial and date the schedule, authorizing the retention requirements.
LEG-13, V. F	Section C- 9-15; Appendix B-3	Complete	Establish records center(s) on- or off-site for the storage, control and protection of inactive records. Ensure that each center provides reasonable safeguards against potential perils such as fire, water damage, rodent or insect infestation, theft, and floods; and implements security control which prevent unauthorized use, disclosure, and/or destruction of records.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
LEG-13, V.G.	Section C-12,14; D; Appendix B-3	Complete	Develop formal controls for records transmittal to, and management, retrieval and destruction of inactive records consigned to the records center.
LEG-13, V. H.	Section C-3; Appendix B-2	Complete	Wherever possible, use computer-based tools to manage records storage and retrieval, and micrographic equipment and techniques for records storage.
LEG-13, V. I.	Section A-1	Complete	To the extent possible, ensure that records do not contain personal notations.
LEG-13, V. J.	Section A-3; Appendix B-1	Complete	Ensure that records which must be retained after a program has been concluded are administratively turned over to the general staff of the appropriate function, such as Product Assurance or Technical Operations, who will be responsible for the maintenance of those records in accordance with this directive, the element's records retention schedule, and contract requirements.
LEG-13, V. K.	Section C-7	Complete	Ensure that transferring or terminating personnel convey records for which they are responsible to other appropriate company employees, and that records are not removed from company premises or destroyed without proper authorization.
LEG-13, VI. A	Section D; C-14 Appendix B-3	Complete	SCREENING. At least annually, records used in current operations will be screened, and designated as active or inactive. Duplicate inactive records which serve no useful purpose will be destroyed. Inactive records will be identified, given a specific destruction date in accordance with the element's retention schedule, and placed in the records center.
LEG-13, VI. B.	Section C-15; Appendix B-3	Complete	STORAGE OF INACTIVE RECORDS. Records center personnel will assign a storage code, log, and store the records, and ensure that they may be readily retrieved.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
LEG-13, VI. C.	Section C; Appendixes B-2,3	Complete	RETRIEVAL OF INACTIVE RECORDS. Only records management personnel and records administrators will have access to stored records. Only the responsible records administrator may authorize the retrieval of records belonging to a given function, program or department.
LEG-13, VI.D	Section D-3; Appendix B-3	Partial	AUTHORIZATION FOR DESTRUCTION. Prior to authorizing destruction of active records, the responsible records administrator may authorize the retrieval of records belonging to a given function, program or department. Six months prior to the scheduled destruction date assigned to inactive records in storage in the records center, the Business Operations, Tax, Legal, and consigning departments (and, when appropriate the Environmental Manager or designee) must sign an authorization for destruction of the records. Any records not authorized for destruction must be assigned a new destruction date per the operating element's retention schedule, returned to records center storage, and remain under control of the department(or environmental manager or designee) which assigned the revised destruction date, until authorized for destruction.
LEG-13, VI. E.	Section D-3 Appendix B-3	Complete	DESTRUCTION. The records manager must ensure that only those records which are properly authorized for destruction are destroyed. All paper records authorized for destruction will be destroyed by incineration or shredding. Consideration should be given to the recycling of shredded records.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-QA-17.0, 11/22/91, Quality Assurance Records V B	Complete Sections A; B; C; D; E	Records that furnish physical evidence of the quality of an item, product, process, structure, or facility or the qualifications of an individual shall be maintained and shall contain sufficient information to permit direct identification and traceability to the facility or project they represent. Design specifications, procurement documents, risk assessments, test procedures, inspection procedures, and operating procedures shall specify the documents to be generated, supplied, and maintained.
	ESS-QA-17.0 V.C	Complete C-2; Appendix D	Documents or other types of objective evidence shall be considered valid records only if stamped, initialed, signed and dated, or otherwise authenticated by authorized personnel. The authentication may take the form of a statement by the designated responsible individual or organization. Handwritten signatures are not required if the document or objective evidence is clearly identified as a statement by the reporting individual or organization. These records may be originals or a legible reproduction.
	ESS-QA-17.0 V. D.	Complete A, Entire procedure	Records shall be distributed, handled, and controlled in accordance with written procedures that contain enough detail to provide guidance to fulfill the requirements for an acceptable records system, as described herein.
	ESS-QA-17.0 V.E.	Complete A-2	Recorded information written on a printed form shall be legible using black or other suitable marking materials, of reproducible microfilm quality, identifiable with unique identification for traceability, and retrievable.
	ESS-QA-17.0 V.F.	Complete Appendix C-5,6,7,8,9	Suitable backup copies shall be made and stored in separate locations, or printed copies of the program or data shall be available when recorded information is on magnetic media (computer disks, tapes, or other formats).

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-QA-17.0 V.G.	Complete B Appendixes B-3, D	Lifetime records shall be maintained as record copies or stored for future use (in accordance with DOE Order 1324.2) for the life of the particular item, process, system, structure, or facility while it is installed.
	ESS-QA-17.0 V.H.	Complete B Appendixes B-3,D	Nonpermanent records shall be maintained as record copies (in accordance with DOE Order 1324.2) for the retention period noted on the document as specified on a data sheet or retention schedule.
	ESS-QA-17.0 V.I.	Complete Appendix B-3	Government or other management directives may require that certain lifetime or nonpermanent records be maintained for a longer period than required by this standard.
	ESS-QA-17.0 V.J.	Complete C-1; Appendix B-2	Records shall be corrected, modified, or amended in accordance with procedures that prescribe the review and approval requirements. The modifications or corrections shall include the date and the identification of the person authorized to issue corrections or modifications.
	ESS-QA-17.0 V.K.	Complete C-12	Receipt control systems shall include the following as a minimum: 1. method for designating the records, 2. method for identifying records received, 3. procedure for receiving and inspecting incoming records, 4. method for submitting completed records to the storage facility, and 5. method or system for providing the current status of records during the receiving process.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-QA-17.0 V.L.	Complete C; Appendix B-2,3	Written storage procedures shall be prepared for both nonpermanent and permanent (lifetime) storage before storage of records. The procedure shall include the following as a minimum: 1. description of the storage facility; 2. filing system used; 3. methods or procedures used to verify that the records received are in agreement with the transmittal document and that the records are legible or of a reproducible quality; 4. rules governing access, control, and accountability for records removed from the storage facility; 5. method for filing supplemental information, additional records, ore corrections, and 6. identification of duplicate storage facility where applicable.
	ESS-QA-17.0 V.M.	Complete; Appendixes B-3; C-5,6,7,8,9 Section C	Record storage provisions shall apply as follows: 1) The storage system shall provide conditions suitable for preventing damage from moisture, temperature, pressure, magnetic fields, or light. 2) Permanent and nonpermanent records shall be properly packaged by being firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets, on shelving, or in containers. Magnetic or electronic media shall be protected from magnetic fields and from the conditions listed in 1 above. 3) Measures shall be established to provide replacement of lost or damaged records. When replacement or restoration cannot be achieved, an Occurrence Reporting System Form will be prepared, and the resulting recommendations shall be followed. 4) Measures shall be established to guard against larceny and vandalism and to preclude entry of unauthorized personnel into the records storage area.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-QA-17.0 V.N.	Complete Section C-15; Appendix B-2,3	Records shall be stored in facilities constructed in facilities constructed and maintained so as to minimize the risk of damage or destruction of records from the following: 1) natural disasters such as wind, flood, and fire; 2) environmental conditions such as high and low temperatures and humidity; 3) infestations of insects, molds, or rodents.
	ESS-QA-17.0 V. O.	Complete; C-3 Appendix B-2	In-plant storage systems shall provide for timely retrieval, normally not to exceed 4 hours from the time the document or records are requested.
	ESS-QA-17.0 V. P.	Complete Section C-4, 13	Listings shall be maintained and posted at the entrance of the records storage area to designate those personnel who shall have access to the stored records.
	ESS-QA-17.0 V. Q.	Complete Section A-3; Appendix B-1	Records maintained by suppliers, vendors, or subcontractors at their facilities or other locations shall be accessible to individuals designated by Energy Systems, as required by specifications or contract.
	ESS-QA-17.0 V. R.	Complete Section A-3; Appendix B-1	Records accumulated at various locations before transfer shall be made accessible to designated Energy Systems representatives for evaluation, as required by specifications or contract.
	ESS-EM-112, 8/8/14/92, Emergency Operating Records Protection Program IV B	Complete; Appendix C-3	Each site shall develop a site specific list of emergency operating records.
	ESS-EM-112 IV C	Complete; Appendix C-3	Each site shall maintain certain Emergency Operating Records in or accessible to the EOC/Emergency Control Center (ECC).

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-EM-112 IV D	Complete; Appendix C-3	If the records are not located physically in the EOC/ECC, a list of the documents and locations shall be available in the EOC/ECC. In addition to the list, a call-in roster of persons needed to access and interpret the documents shall be maintained.
	ESS-EM-112 IV E	Complete; Appendix C-3	Records must be in a medium that is readable under any likely emergency condition.
	ESS-EM-112 IV F	Complete; Appendix C-3	The required Emergency Operating Records include as a minimum (official record copies shall not be used): 1) site emergency plans; 2) emergency preparedness/response procedures; 3) site Safeguards and Security Plan/Master Safeguards and Security Agreement; 4) security patrol/protective forces procedures; 5) site and area maps; 6) engineering drawings; 7) prefire plans; 8) hazard and consequence assessments including locations and quantities of material; 9) emergency equipment and supplies; 10) site succession of command; 11) description of essential emergency functions; 12) lists of key personnel (EOC Cadre, emergency response teams, employees with special skills, procurement personnel and emergency call lists); 13) location of complex industrial records (as applicable); 14) location of special nuclear materials inventories.
	ESS-EM-112 IV G	Complete; Appendix C-3	All Emergency Operating Records shall be identified and stored in accordance with the improved level of fire protection required by 5480.7
	ESS-EM-112 IV H	Complete; Appendix C-3	Storage of classified documents shall be approved in accordance with DOE 5634.1A.
	ESS-EM-112 IV I	Complete; Appendix C-3	EOC Cadre members shall receive training on the location and availability of Emergency Operating Records.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-EH-101, 3/15/93, Environmental, Safety, and Health Activities Required Records Section V.A.	Complete; A Appendix C-2	Central and site Environmental Safety and Health (ES&H), Waste Management (WM), and ER organizations shall maintain the appropriate records required by Federal, state, and local laws, regulations and rules, standards, guidelines, operating codes, and Codes of Federal Regulations, in addition to those described in the Appendix to this standard and other Energy Systems standards and procedures. These records may already exist or need to be generated, collected, maintained, and retained indefinitely or until otherwise directed by this standard. Central ES&H organizations shall maintain copies of current corporate directives. The Appendix is a 4 page listing of required records.
	ESS-EH-101 Section V. B.	Complete; A; B Appendix C-2	Central and site ES&H, WM, and ER organizations will keep, as a minimum, a list and location of the records maintained to fulfill these requirements.
	ESS-EH-101 Section V. C	Complete; Appendix C-2	Central and site ES&H, WM, and ER organizations shall establish record management systems for efficient and quick retrieval.
	ESS-EH-101 Section V. D.	Complete; Appendix C-2	Central and site ES&H, WM and Er organizations shall establish identification criteria and implement the process to designate QA records and permanent, lifetime records for required maintenance and retention.
	ESS-IO-102, Rights and Interests Records Protection Program, 4/16/93 Section V.B	Complete; Appendix C-4	Installations shall develop a specific list of Rights and Interests Records. Records shall be listed by title and include contact person and location. Refer to Appendix A for categories of required Rights and Interests Records. Others may be added as approved by Site/Major Organizations and Energy Systems.

Table 2 (continued)

Administrative and technical basis			Level 1 document number IO-101, Records Management, Rev. 2
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
	ESS-IO-102 Section V. C	Complete; Appendix C-4	Identification, storage, maintenance, and disposition of Rights and Interests Records for each installation shall be done in accordance with written instructions incorporating requirements and agreements, (i.e., Records Inventory & Disposition Schedules).
	ESS-IO-102 Section V. D	Complete; Appendix C-4	Rights and Interests Records may be in any medium for which readability will be feasible.
	ESS-IO-102 Section V. E	Complete; Appendix C-4	Location of rights and interests records and the use of duplicate copies shall be determined on a records series basis.
	ESS-IO-102 Section V. F	Complete; Appendix C-4	A determination shall be made as to whether the original or official record copy or a duplicate will be designated as the Rights and Interests Record. If the original or official record copy is used, there shall be agreement among the Department of Energy (DOE), Energy Systems, and the Site/Major Organizations; and storage locations used shall meet the risk level of fire protection required by DOE Order 5480.7, Fire Protection.
	ESS-IO-102 Section V. G	Complete; Appendix C-4	Persons assigned the responsibility of maintaining Rights and Interests Records shall receive training on identification, location, and availability of Rights and Interests Records.
	ESS-IO-102 Section V. H	Complete; Appendix C-4	Annual reviews of Rights and Interests Records shall be conducted at each site.
DOE Radiological Control Manual (6/92) Radiological Records, Chapter 7	Appendix C, 1 B refers user to this document	Complete	

**Table 3. DOE-ORO ER Program and Energy Systems records management and document control requirement units
ESS-IO-201, Document Control, Rev. 2**

Administrative and technical basis			Level 1 document number ESS-IO-201, Document Control, Rev-2 (8/20/93)
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE 4700.1, 3/6/87, Project Management System Chapter III, Part D, 2f	IO-201, Document Control, Rev. 2 Sections A,B,C,D,E,F,G,H,K	Complete	Document control is a means by which all program documentation can be controlled, tracked, and updated in a timely manner to ensure that applicability and correctness shall be established. The control measures, which should be initiated and followed, should assure that such documents are reviewed for adequacy, approved for release by authorized personnel, and are distributed to and used at the location of the prescribed activity.
DOE 5480.19, 7/9/90, Conduct of Operations Requirements for DOE Facilities Chapter XVI, C, 6 Para. 2	IO-201 Sections E,F,G,K,1	Partial	Working copies should be controlled and a system should be in place to ensure that outdated procedures are not used by mistake and that working copies are replaced according to approved procedures. Working copies of controlled documents are not specifically addressed.
DOE 5480.19 Chapter XVI, C 3,4	IO-201 Sections A, B	Also covered by MS 151	Procedure changes and revisions. Change refers to an on-the-spot change; does not involve retyping or reissuing. Revisions constitute a new, retyped edition of the procedure.....All currently effective changes should normally be incorporated when the procedure is revised.....Revisions should receive the same depth of review and level of approval as the initial versions. New and revised procedures should be approved prior to use.
DOE 5480.19 Chapter VIII, 10.	IO-201 Sections E, F, I, K	Complete	A system should be established to ensure that the operations personnel receive and utilize the latest revisions of engineering drawings and specifications.
DOE 5481.1B, 9/23/86, Safety Analysis and Review System Chapter I, Part 3, d.	IO-201 Section A	Complete	This reference defines safety analysis reports as controlled documents.

Table 3 (continued)

Administrative and technical basis			Level 1 document number ESS-IO-201, Document Control, Rev-2 (8/20/93)
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE 5500.3A, 4/30/91, Planning and Preparedness for Operational Emergencies 11 c (13) (b)	IO-201 Section A	Complete	This reference defines emergency operating plans and procedures as controlled documents.
DOE 5700.6C, 8/21/91, Quality Assurance 9.c. (d)	IO-201 Sections A - K	Complete	Documents shall be prepared, reviewed, approved, issued, used, and revised to prescribe processes, specify requirements, or establish design.
DOE 5700.6C Attachment I, 4.a.(1)	IO-201 Procedure	Complete	A process should be established and implemented to control preparation, review, approval, issuance, use, and revision of documents that establish policies, prescribe work, specify requirements, or establish design.
DOE 5700.6C Attachment I, 4.a.(2)	IO-201 Sections "Applies To", A	Complete	The scope of the document control system should be defined. Examples of documents to be controlled should include drawings, data files (including various media), calculations, specifications, computer codes, purchase orders and related documents, vendor-supplied documents, procedures, work instructions, operator aids, and data sheets.
DOE 5700.6C Attachment I, 4.a.(3)	IO-201 Sections B, E, F	Partial Procedure does not state specific times for distribution process.	Revisions to controlled documents should be reviewed and approved by the organization that originally reviewed and approved the documents. An alternative organization may be designated based on technical competence and capability. Timeliness guidelines should implemented for distribution of new or revised controlled documents.
DOE 5700.6C Attachment I, 4.a.(4)	IO-201 Sections Purpose, E	Complete	Controlled documents should be distributed to and used by personnel performing work.

Table 3 (continued)

Administrative and technical basis			Level 1 document number ESS-IO-201, Document Control, Rev-2 (8/20/93)
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
DOE 5700.6C Attachment I, 4.a.(5)	IO-201 Sections E, F	Complete	Control of superseded and cancelled documents should include measures to ensure that only correct documents are in use. Record copies should be marked "superseded" or "cancelled" and kept for a specified retention period.
NQA-1, Basic Requirement 6	IO-201 Sections A, B, E	Complete	The preparation, issue, and change of documents that specify quality requirements or prescribe activities affecting quality shall be controlled to assure that correct documents are being employed. Such documents, including changes thereto, shall be reviewed for adequacy and approved for release by authorized personnel.
NQA-1, Supplement 6S-1 1, Paragraph 2	IO-201 Section Applies To, and I	Complete	The documents which shall be controlled in accordance with this Supplement are only those documents which specify quality requirements or prescribe activities affecting quality such as instructions, procedures, and drawings.
NQA-1, Supplement 6S-1 1, Paragraph 3	IO-201 Sections: Purpose, A, B, E, F	Complete	The term document control used throughout this Supplement is defined as the act of assuring that documents are reviewed for adequacy, approved for release by authorized personnel, and distributed to and used at the location where the prescribed activity is performed.
NQA-1, Supplement 6S-1 2	IO-201 Sections: Applies To, A, C-3	Complete	The control system shall be documented and provide for a-c: a) identification of documents to be controlled and their specified distribution; b) identification of assignment of responsibility for preparing, reviewing, approving, and issuing documents; c) review of documents for adequacy, completeness, and correctness before approval and issuance.

Table 3 (continued)

Administrative and technical basis			Level 1 document number ESS-IO-201, Document Control, Rev-2 (8/20/93)
Compliance document	Level 1 document section	Flowdown status	Requirement unit text/comments
NQA-1, Supplement 6S-1 3.1	IO-201 Section B	Complete	Changes to document, other than those defined as minor changes in para. 3.2 below, are considered as major changes and shall be reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated. The reviewing organization shall have access to pertinent background data or information upon which to base approval.
NQA-1, Supplement 6S-1 3.2	IO-201 Section B	Complete	Minor changes to documents, such as inconsequential editorial corrections, shall not require that the revised documents receive the same review and approval as the original documents. To avoid a possible omission of a required review, the type of minor changes that do not require such a review and approval and the persons who can authorize such a decision shall be clearly delineated.

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