SRS ES&H STANDARDS COMPLIANCE PROGRAM IMPLEMENTATION PLAN (U)

August 31, 1994

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ADC &
Reviewing
Official:

William H. Hearn, Fellow Engineer

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Approver:

NAME	ORGANIZATION	SIGNATURE	DATE
W. L. Luce Regulatory Compliance Manager	WSRC - ESH&QA	<i>WL Luce</i>	8/30/94

Author:

NAME	ORGANIZATION	SIGNATURE	DATE
W. H. Hearn	WSRC - ESH&QA/ OOCDC/RCS	<i>W. H. Hearn</i>	8/30/94

INTRODUCTION

On March 8, 1990, the Defense Nuclear Facilities Safety Board (DNFSB) issued Recommendation 90-2 to the Secretary of Energy (Ref. 1). This recommendation, based upon the DNFSB's initial review and evaluation of the content and implementation of standards relating to the design, construction, operations, and decommissioning of defense nuclear facilities of the U. S. Department of Energy (DOE), called for three actions:

- (1) Identification of specific standards that apply to design, construction, operation and decommissioning of DOE facilities;
- (2) Assessment of the adequacy of those standards for protecting public health and safety; and
- (3) Determination of the extent to which they have and are being implemented.

SRS initiated two parallel efforts to address aspects of Recommendation 90-2. An Order Compliance Program was established with initial focus on compliance with requirements contained in Environment, Safety, and Health (ES&H) related DOE Orders, both from a programmatic perspective as well as from a field adherence perspective; and a Standards/Requirements Identification Document (S/RID) development program was established to specify a "necessary and sufficient" set of ES&H requirements to protect the environment and public/worker safety and health. During the period while the S/RID methodology was being developed, many of the DOE ES&H Orders were revised and substantially improved. These improvements captured many of the insights gained in the developing S/RID program.

As the SRS Order Compliance and S/RID programs matured and achieved major deliverables in 1993 and 1994, major overlaps between the two programs were identified. In early 1994, WSRC and DOE-SR determined that the two separate programs should be physically and organizationally integrated (and further merged with newly identified needs associated with Price-Anderson Amendments Act nuclear safety regulations) to become a single SRS Compliance Program. The basic concept behind the integration is to maintain aspects and some deliverables of the individual programs, but to ensure full utilization of common compliance techniques and results, such that cost-ineffective repetitions could be eliminated. SRS is actually at a point in the cycles of the separate programs where such an integration is both desirable and reasonably achievable. ES&H Order Compliance Phase 1 (programmatic compliance) efforts have just been completed for the site and Phase 2 (field adherence compliance) efforts have been completed for a number of nuclear facilities. These efforts provide a firm foundation for demonstration of the overall phased processes to demonstrate compliance with requirements, and further represent completion of a very large portion of the compliance assessments that will be necessary in support of the SRS S/RID. Similarly, the SRS S/RID development is significantly mature through a formal SRS draft S/RID submitted in March 1994 and the recent completion of a detailed review (by WSRC operating division personnel) of the draft S/RID requirements that went beyond current DOE Order requirements. Program integration at this juncture is necessary to ensure full utilization of common compliance conclusions, consistent compliance interpretations, and consistent implementation of any corrective actions and ongoing self-assessments.

This document defines the program for integration of the WSRC Order Compliance, S/RID, and Price-Anderson Compliance activities. This plan supersedes the SRS ES&H Standards Compliance Program Management Plan (Ref. 2) and the SRS ES&H Standards Compliance Program Implementation Plan (Ref. 3).

ORGANIZATIONAL STRUCTURE AND RESPONSIBILITIES

WSRC will manage the production of the Site S/RID (and other supporting formal compliance deliverables) from the Regulatory Compliance Section of the Operations Oversight and Compliance Department of the ESH&QA Division. Lead functional responsibilities across WSRC organizations will be maintained for individual DOE Orders, individual regulations, and the 20 S/RID functional areas. In addition, ultimate responsibility for compliance with requirements will continue to be held by field organizations and/or program organizations, as appropriate for the individual requirements.

PROGRAM SPECIFICATION AND SCOPE

An SRS Site S/RID will be developed that will contain identification of applicable ES&H requirements for SRS facilities that are necessary and sufficient for effective facility operations. The following specifications will be satisfied by the SRS Site S/RID:

Functional Areas

The S/RID will be functionally arranged into the 20 Functional Areas and subareas as specified in the ES&H Configuration Guidelines (Ref. 4). Subarea deviations from the guidelines can be used if appropriate for consistency with Standards/Requirements Information Database (STRIDE) numbering or if justified to DOE-SR on some other acceptable basis. WSRC intends to maintain S/RID requirements and compliance information in a database that will include cross-references to other appropriate numbering systems.

Requirements for Inclusion

The March 1994 draft SRS S/RID represents a strong foundation for building the revised S/RID. Beyond considering the need for inclusion of any appropriate facility-specific requirements (expected to be minor), it is not the intent of the revised S/RID activity to reengineer the effort, especially in relation to reconsideration of the need for additional (non-Order/Regulation) requirements beyond those already specified in the draft S/RID. Rather, the effort will primarily focus on ensuring the requirement sources reflect current versions and are fully consistent with agreed upon specifications through the Order Compliance activities. ES&H requirements from DOE Orders, Federal and State Regulations, and other sources will be included in the S/RID as follows:

- (1) All WSRC applicable requirements from the 52 DOE Orders of Interest to the DNFSB will be included as specified through the latest WSRC Compliance Assessment and Implementation Reports. (Requirement "roll-ups" as necessary to maintain reasonable consistency with STRIDE will be incorporated.)
- (2) WSRC applicable requirements from other DOE Directives will be included as specified in the March 1994 draft S/RID, with consideration of any existing WSRC Compliance Assessment and Implementation Reports. (Requirement "roll-ups" as necessary to maintain reasonable consistency with STRIDE techniques will be incorporated.)
- (3) ES&H Federal and State regulations (including issued Price-Anderson nuclear safety regulations) that are applicable to WSRC by virtue of Law will be included.
- (4) Other ES&H Federal regulations that are applicable to WSRC by virtue of DOE Policy (only) will be included as specified in the March 1994 draft S/RID.
- (5) Requirements beyond DOE Orders and Federal/State regulations that are applicable to WSRC will be included as specified in the March 1994 draft S/RID, with appropriate consideration of the recommendations for combining/deleting requirements per the August 1994 NMPD Study (Ref. 5).

Requirement Source Cut-Off Date

Source documents containing applicable ES&H requirements are subject to continuous change. Since it is not possible to ensure delivery of S/RID functional areas that are fully up to date at the time of delivery, requirement cut-off dates must be established as follows:

- (1) September 15, 1994 is the cut-off date for all requirement source documents that cross into more than one functional area; and
- (2) The scheduled functional area submittal date to DOE-SR minus 2-1/2 months is the cut-off date for all requirement source documents that relate to single functional areas.

Procedural arrangements for periodic updates to S/RID requirements and compliance conclusions will be specified in the December 1994 revision to WSRC Procedure Manual 8B, DOE DIRECTIVES ADMINISTRATION MANUAL.

Requirement Applicability Information

WSRC intends to maintain S/RID requirements and compliance information in a database that will permit sorting in various manners. However, as a minimum, each S/RID requirement will be assigned to:

- (1) One or more of the four Facility Categories (i.e., Operating Facility, Mission Transition Facility, Decontamination and Decommissioning Facility, and Environmental Remediation Facility); and
- (2) One or more individual SRS nuclear facility and/or non-nuclear facility group(s).

Compliance Information

Basic compliance information that will be associated with each requirement (in accordance with the schedules specified in a later section) follows:

- (1) Phase 1 programmatic compliance conclusion and associated procedural references and/or noncompliance Requests for DOE Approval (including any associated Price-Anderson nuclear safety regulation formal submittals); and
- (2) Identification of the WSRC-SCD-4, Operational Readiness Functional Area Requirements (Ref. 7) functional area performance objectives and criteria for those requirements (i.e., significant safety related) that are to be included in periodic Phase 2 self-assessments, as well as an indication of "programmatic" and/or "facility-specific" self-assessment responsibilities. The current 22 Functional Areas from WSRC SCD-4 will be maintained for Phase 2 self-assessments.

REVISION DEVELOPMENT APPROACH

WSRC Task Teams, assigned by functional area, will be established to produce each of the 20 functional area sections of the revised SRS S/RID. The Task Teams will be composed of:

- (1) Functional Area Managers,
- (2) Subject Matter Experts,
- (3) Facility Technical Experts, and
- (4) Lead Engineers from the Regulatory Compliance Section.

Formal approval from the Functional Area Manager will be necessary before submittal of the revised S/RID functional area to DOE-SR.

SCHEDULES AND DELIVERABLES

Revised SRS Site S/RID sections will be submitted to DOE-SR as follows:

Functional Areas for Submittal by Nov. 30, 1994			
4	Training and Qualification	8	Construction Program
11	Radiological Protection		
Functional Areas for Submittal by Dec. 31, 1994			
6	Safeguards and Security	9	Operations
17	Occupational Safety & Health	20	Environmental Protection
15	Decontamination and Decommissioning		
Functional Areas for Submittal by Jan. 31, 1995			
1	Management Systems	7	Engineering Program
16	Waste Management		
Functional Areas for Submittal by Feb. 28, 1995			
2	Quality Assurance	3	Configuration Management
5	Emergency Management	10	Maintenance
18	Nuclear Safety		
Functional Areas for Submittal by Mar. 31, 1995			
12	Fire Protection	13	Packaging and Transportation
17	Research and Development & Experimental Activities	14	Environmental Restoration

[It may be necessary for WSRC to switch some of the Functional Areas for any given grouping; however, the same number of functional area sections will be delivered by the specified due dates.]

The Functional Area submittals will include Phase 1 compliance information and appropriate SCD-4 linkages if the information is available for the specific requirements included in the S/RID. Generally, this will mean that such information will be included for requirements that come from DOE ES&H Orders of Interest to the DNFSB.

Other program schedules and deliverables:

- (1) By December 31, 1994 issue a revision to WSRC Procedure Manual 8B to formalize the integrated Compliance Program;
- (2) By May 31, 1995 (tentative date to be confirmed by March 31, 1995) complete a Phase 1 programmatic compliance assessment for all requirements that were not previously assessed under the Order Compliance Program, and identify appropriate SCD-4 linkages and/or possible areas for SCD-4 revision;
- (3) By September 30, 1995 include any necessary changes to SCD-4 in its periodic revision. (Other periodic revisions to SCD-4 are scheduled for issuance by September 30, 1994 and March 15, 1995 to maintain the Performance Objectives and Criteria current with WSRC programs and to address enhancements recommended by the DNFSB, DOE, and WSRC users.)

REFERENCES

- 1 DNFSB Letter, March 8, 1990, Conway (DNFSB) to Watkins (DOE), **Transmittal of Recommendation to the Secretary of Energy pursuant to Section 312(5) of the Atomic Energy Act of 1954, as amended.**
- 2 WSRC-TR-93-346, Rev. 1, September 8, 1993, **SRS ES&H STANDARDS COMPLIANCE PROGRAM MANAGEMENT PLAN.**
- 3 WSRC-TR-93-347, Rev. 1, September 8, 1993, **SRS ES&H STANDARDS COMPLIANCE PROGRAM IMPLEMENTATION PLAN.**
- 4 DOE-HQ, **ES&H Configuration Guidelines, Rev. 0**, July 30, 1993.
- 5 WSRC Memorandum, NMP-ERP-94-0008, R. A. Frushour to W. L. Luce, **Review of Standards/Requirements Identification Documents (S/RIDs)**, August 25, 1994
- 6 WSRC-SCD-4, **Operational Readiness Functional Area Requirements**