

DNFSB Review Coordination

DOE Directives Workshop April 2007

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(DOE HS-1.1 Support)



Why DNFSB Review?

Board has statutory authority to review directives:

“REVIEW AND EVALUATION OF STANDARDS. The Board shall review and evaluate the content and implementation of the standards relating to the design, construction, operation, and decommissioning of defense nuclear facilities of the Department of Energy (including all applicable Department of Energy orders, regulations, and requirements) at each Department of Energy defense nuclear facility.” [42 USC 2286a, Functions of the Board]

Why DNFSB Review?

- DOE prefers to resolve Board comments on DOE directives at an informal, staff-to-staff level if possible.
- If not possible, DOE can go forward with directives but Board may elevate comments and concerns publicly to the Secretary of Energy.

Responsibilities – OPI / Writers

- Pre-Coordinate with HS-1.1 on Safety Directives
(*DOE O 251.1B, 5.h.5*)
- Ensure HS-1.1 is copied on Draft Safety Directives
(*DOE M 251.1-1B, III.4.e.2*)
- Coordinate with HS-1.1 on Safety Directives
(*DOE M 251.1-1B, II.5.c.9*)
- Resolve DNFSB Comments, coordinating w/ HS-1.1
(*DOE M 251.1-1B, V.5.i.2*)
- Consult with HS-1.1 when Canceling Directives
(*DOE O 251.1B, 5.h.6; DOE M 251.1-1B, VI.3.d.2*)

Responsibilities – HS-1.1

- Maintains Current List of Directives of Interest
(DOE O 251.1B, 5.i.1)
- Facilitates Board review & comment on Directives
(DOE O 251.1B, 4.b.5 & 5.i.2; and M 251.1-1B, III.4.g.1)
- Facilitates Resolution of Board comments with OPI
(DOE O 251.1B, 4.b.5 & 5.i.2; and M 251.1-1B, III.4.g.2)
- Concurs on Canceled Safety Directives
(DOE O 251.1B, 5.i.4 & 5.i.5; DOE M 251.1-1B, VI.2.b)
- Obtains Resolution or Raises for Decision
(DOE O 251.1B, 5.i.3; and DOE M 251.1-1B, V.5.k)

Scope: DOE Directives of Interest to the DNFSB

- All directives related to protecting the safety and health of the public, the workers, and the environment
- Defined by the Defense Nuclear Facilities Safety Board
- 40 Current Orders; 58 Archived Orders; 74 Other Directives, Rules, and Clauses; Technical Standards; and NNSA Directives
- Available at www.hss.energy.gov/deprep/



Key Process Elements

- Process takes place outside of REVCOM
- Process parallels REVCOM process
- Good pre-coordination can save loads of time later
- Board staff wants to see draft directive and redline/mark-up from previous version
- MA will enforce requirement for Board review

We're Here to Help!

- Identifying Directives of Interest to the Board
- Identifying interested Board staff members
- Setting up meetings with the Board staff
- Passing Information
- Assisting in Developing Resolutions and Bases
- Facilitating Comment Resolution with the Board
- Requesting Expedited Reviews
- Elevating Conflicts to Senior management

HS-1.1 Points of Contact

- Mark Whitaker, the DOE Departmental Representative to the DNFSB (HS-1.1)
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