

DOE O 151.1C FAQ

Program Elements: Hazards Survey/Hazards Assessment (Technical Planning Basis)

Rev. 0

Approved: 03/19/09

SCREENING HAZARDOUS MATERIALS NOT CURRENTLY AT FACILITIES, BUT LISTED IN A SAFETY BASIS DOCUMENT

QUESTION: DOE O 151.1C indicates that a hazardous material screening process must identify specific hazardous materials and quantities in a facility that, if released, could produce impacts consistent with the definition of an Operational Emergency. The potential release of these materials to the environment requires further analysis in an Emergency Planning Hazards Assessment (EPHA). What is the screening requirement (or intent) of DOE O 151.1C for a hazardous material that is not currently stored at a facility, but that is identified in facility safety basis documentation (e.g., SAR/DSA) on a list of radiological and non-radiological hazardous material inventories that may be present in facilities identified at the site? Does DOE O 151.1C intend that all hazardous materials analyzed in the safety basis document be screened as soon as practical or only when the materials are to be brought into the facility for use or storage?

ANSWER: According to DOE O 151.1C Chapter III, 3.b and Attachment 2, 2.b, a facility Hazards Survey should be reviewed and updated, as necessary:

“Hazards surveys must be updated every three years, and prior to significant changes to the site/facility or to hazardous material inventories. For example, significant changes are those changes which would result in an unreviewed safety question for nuclear facilities, as defined in 10 CFR 830, or in an unreviewed safety issue for accelerator facilities, as defined in DOE O 420.2B. Changes that result in a reduction of hazards with no adverse effect on safety or emergency preparedness or response may be included in the next scheduled review and update.”

It is the intent of the Order and guidance that a new substance (or a larger quantity of a substance already screened) should be screened prior to its actual introduction into the facility.

Materials that are addressed in the safety basis, but not currently used or stored in the facility, need not be screened if there are administrative controls or other methods to ensure that they are subject to screening before actually being introduced into the facility.

The intent of the Order and guidance can also be met by screening the entire list of materials and quantities that are "authorized" under the facility safety basis. Under this approach, the inventory limits and other controls derived from the safety basis analysis can help ensure that facility operations are also within the emergency management Technical Planning Basis.