

# DIRECTIVES CONTROL FORM - ORO O FINAL DIRECTIVE

## PART A (To be completed by the Division of Primary Interest (DPI))

1. NUMBER AND TITLE OF DIRECTIVE: **ORO O 250, Chapter VI, Chg. 2, DIRECTIVE IMPLEMENTATION PLANS AND EXEMPTION REQUESTS**

2. PURPOSE OF TRANSMITTAL:  New Directive  Revised Directive  Page Change

3. THIS DOCUMENT MAY AFFECT THE WORK PERFORMED BY THE FOLLOWING CONTRACTORS: (Check appropriate boxes)

No (all contractors)

Yes If yes, whom?  BWXT Y-12  UT-B  ORAU  SURA

Bechtel Jacobs Company

Other contractors (list by type)

*Many ORO contractors have approved S/RIDs or WSS sets that may affect applicability of contractor requirements from this directive. Applicability of contractor requirements must take into account the approved standards set for each particular contract.*

4. SIGNIFICANT PROVISIONS: Are there any significant changes or impact?

No  Yes If yes, describe: This chapter has been revised to reflect current policy. All information previously contained in this chapter concerning Rule Program Documents, Implementation Plans, and Exemption Requests has been moved to a new ORO O 250, Chapter IX, and this chapter retitled. Paragraphs 1 and 3, and subparagraphs 4a and 4b have been revised. The previous subparagraph 4c has been deleted and all subsequent subparagraphs renumbered. Subparagraphs 4d(2), (3), and (5) have been revised, and the previous subparagraph 5a deleted, with all subsequent subparagraphs being renumbered. Subparagraphs 5a(1), 5c, and 5d have been revised. Former subparagraphs 5e(3) and (4) have been combined into a new subparagraph 5d(3). Subparagraphs 5d(4)(b) and (c), 5d(5) first and second paragraphs, and paragraph 6 have been revised. On Attachment 1 (CRD), former paragraphs 1 and 2 have been deleted and subsequent paragraphs renumbered; paragraph 1 has been revised; and new paragraphs 2 and 3 have been added.

5. CONTACT POINT: Wayne H. Albaugh Directives Management Group, AD-440 576-0974  
Name Organization Telephone

## PART B (To be completed by the Directives Management Group (DMG)):

6. FILING INSTRUCTIONS:

<u>Remove</u>	<u>Dated</u>	<u>Insert</u>	<u>Dated</u>
ORO O 250, Chapter VI,	01/06/2000	ORO O Control Form	04/26/2001
Chg. 1, Pages VI-1 through VI-14		ORO O 250, Chapter VI,	04/26/2001
		Chg. 2, Pages VI-1 through VI-11	

*ORO Orders are available on the ORO Directives Management Home Page at [http://www.ornl.gov/doe\\_oro\\_dmg/orchklst.htm](http://www.ornl.gov/doe_oro_dmg/orchklst.htm). The ORO Orders will no longer be mailed in printed copy unless you do not have Internet capabilities.*

7. APPROVED FOR DISTRIBUTION IN ACCORDANCE WITH THE OFFICIAL DIRECTIVES DISTRIBUTION LIST:

Original signed by

Kenneth W. Warden, AD-440

04/26/2001

Signature Management Analyst, AD-440

Rev. 10/12/2000

Date

INSTRUCTIONS TO ADDRESSEES: THIS FORM IS TO BE FILED WITH THE DIRECTIVE AND RETAINED

# U.S. Department of Energy

Oak Ridge Operations

ORO O 250 Chapter VI Chg. 2
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**DATE: 04/26/2001**

## **SUBJECT: DIRECTIVE IMPLEMENTATION PLANS AND EXEMPTION REQUESTS**

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1. PURPOSE. This chapter assigns responsibility and accountability and provides administrative and/or contractual guidance to Oak Ridge Operations (ORO) and its contractors on the preparation, review, approval, and maintenance of implementation plans (IPs) and exemption requests for new and revised standards/requirements placed in the Contract Requirements Baseline (CRB) (i.e., Work Smart Standards [WSS] set, Standards/Requirements Identification Document [S/RID], and administrative directives). Nothing in this issuance changes any requirements contained in any DOE directive.
2. CANCELLATION. This chapter cancels and replaces ORO O 250, Chapter VI, Chg. 1, IMPLEMENTATION PLANS, dated January 6, 2000.
3. APPLICABILITY. The provisions of this chapter apply to ORO Principal Staff and to contractors required to prepare such planning documents by contract.
4. RESPONSIBILITIES.
  - a. Manager approves or disapproves DOE/ORO directives exemption requests within managerial authority, and concurs in requests that must be approved by DOE Headquarters (HQ).
  - b. Principal Staff. If requested by the Contracting Officer's Representative (COR), review and provide comments on IPs and exemption requests.
  - c. Contracting Officer's Representative (COR).
    - (1) Approves contractor IPs for new/revised standards placed in the contract (i.e., WSS set, S/RID, or list of administrative directives).
    - (2) Approves closure of IPs.
  - d. Team Leader, Directives Management Group (DMG).
    - (1) Provides advice and assistance on the requirements of this chapter.
    - (2) Serves as the formal point of receipt for and coordinates review and approval of IPs for new or revised standards/requirements in the CRB (i.e., list of administrative directives, WSS set, or S/RID) and DOE directive exemption requests prepared under this chapter.
    - (3) Prepares forwarding memoranda, as appropriate, for the Manager's signature for directive IPs and exemption requests.

- (4) Coordinates, as requested, with COR organizations regarding review, approval, closure, and tracking of contractor IPs.
- (5) Notifies the originator of approvals and closures for IPs and approval of exemption requests.

5. REQUIREMENTS AND PROCEDURES.

a. DOE Directive Exemption Requests.

- (1) When Required. Requests must be prepared for an exemption from any requirement from DOE directives applicable to Federal activities or included in a CRB
- (2) Exemption Request Contents. DOE M 251.1-1A, DIRECTIVES SYSTEM MANUAL, contains information on content, approval levels, and mandatory notification requirements for DOE directive exemption requests.

**NOTE:** Exemption requests are not customarily prepared for DOE directive requirements contained in an S/RID or WSS set. Requirements in those documents are expected to contain DOE-approved implementation assumptions to explain any deviation from the expected application or implementation of the requirement.

- (3) Review and Approval of DOE Directive Exemption Requests. Exemption requests are processed as described below for DOE directive IPs, except there are no automatic approvals. After concurrence by the appropriate organizations, the DMG forwards the request to the proper approval authorities for action.

b. ORO Implementation Plans.

ORO may be required by a DOE directive to prepare an IP. Typically the DPI has primary responsibility for preparing the plan and for coordinating the plan with all involved ORO organizations. The plan must conform to the minimum content requirements described in subparagraph 5d(3) below, as well as any specific requirements in the directive for which the plan is being prepared. DOE-STD-1082-94, PREPARATION, REVIEW, AND APPROVAL OF IMPLEMENTATION PLANS FOR NUCLEAR SAFETY REQUIREMENTS, may also be used as guidance. Copies of the final plans must be sent to the DMG for the files.

- c. Transition Guidance for WSS Sets. After a WSS set is placed in the contract, the contractor must review all open DOE Directive IPs. This review determines if any planned corrective actions should be revised or dropped because the requirement(s) is no longer in the WSS set or has been rewritten in such a way as to change the corrective action needed to bring the contractor into compliance. Within 90 calendar days of approval of the WSS set, the contractor

must notify the DMG in writing, with a copy to the COR, which items remain open and which are requested to be closed or revised.

d. Implementation Plans for New and Revised Standards/Requirements in the CRB.

- (1) Introduction. This section applies to new standards/requirements added to the CRB in accordance with DEAR 970.5204-2 (formerly DEAR 970-5204-78), such as additions/revisions to a WSS set or S/RID and new/revised administrative directives.
- (2) When Required. When required by the contract, contractors prepare IPs as follows:
  - C When the contractor cannot fully implement new or revised requirements of administrative directives within existing funds and/or within 180 calendar days from the date of the COR's letter requesting an impact assessment.
  - C When the contractor cannot fully implement new or revised WSS or S/RID requirements within existing funds and/or within 180 calendar days from the date the standard/requirement is formally approved for inclusion in the WSS or S/RID via COR letter.
- (3) Implementation Plan Content Description. An IP must contain the following information described in (a) through (n) below. Contractors may submit printouts from internal tracking/trending systems (e.g., ESAMS, LIDS) in lieu of a standard IP if all the required elements are included in the system printout. If a particular heading is not applicable to a specific situation, enter "Not Applicable" or "None."

An IP must also include a statement that all other applicable requirements in the new directive/standard are fully implemented. If the entire directive/standard was placed in the contract, the IP must include a brief justification for any requirements considered to be not applicable. If an IP is required by a particular directive, that directive may require other information and may specify a prescribed format.

- (a) Date of Submission. Self-explanatory.
- (b) Applicability. The plan must clearly identify which site, organization, activities, or facility(ies) are covered.
- (c) Identify Requirements Not Fully Implemented. Identify the requirement(s) that is not fully implemented by source document number, title, paragraph, section number, etc.
- (d) Description of the Noncompliance(s). Discuss the nature and degree of the noncompliance. For example, if the standard/requirement is partially implemented,

discuss what is in place and what is not. Identify the major systems or activities affected. The discussion must be sufficient to enable reviewers to draw conclusions on the degree of risk resulting from nonimplementation, the appropriateness of the action steps, and the reasonableness of the resource estimates.

- (e) Implementation Assumptions. Describe basic implementation assumptions, such as clarification regarding methods for determining applicability, interpretations used in determining compliance status and implementation planning, etc. If this information is contained in the assumptions field of an approved S/RID or WSS set, repeat the text of the approved implementation assumption here. If there are conflicting requirements, identify which of the conflicting requirements will be implemented and explain reasons for the selection.
- (f) Exemptions – List any exemption requests (both submitted and under review or approved) that are related to the requirements covered by the plan and include a copy of them as an attachment. Exemption requests are not customarily submitted for WSS set or S/RIDs.
- (g) Compensatory Measures. If compensatory measures are deemed necessary to offset increased environment, safety, and health (ES&H) risks associated with the noncompliance, include a description of those measures and a schedule for implementing them. Summarize the compensatory measures in the first paragraph, followed by a more detailed description and explanation in subsequent paragraphs. Clearly indicate what measures are in place, which will be implemented before DOE approval, and which will be implemented only after DOE approval. Distinguish between measures that were in place before discovery of the noncompliance and measures put into place because of the noncompliance. Provide a schedule with dates for initiation, duration, and completion of measures that are not fully in place.

If compensatory measures are not required, so state. Provide an explanation for this conclusion that is related to the discussion of increased risk under the next heading. Some examples of situations where compensatory measures may not be needed are:

- C The noncompliance has no direct or immediate impact on worker or public health or safety or protection of the environment.
  - C The probability or the consequences of an accident that would be prevented by compliance with the requirement are negligible during the time the corrective actions are being implemented (e.g., operations are shut down).
- (h) Risk of Not Implementing Immediately. Discuss any ES&H, security, quality assurance, or other concern created by the delay in implementation of the requirement.

Provide a full description of how the existing or planned compensatory measures reduce the risk. If there is little or no risk associated with the noncompliance, provide a sound, reasoned justification for that statement.

**NOTE:** Do not skimp on this section. Failure to fully discuss the risks is the most common cause for rejection of an IP.

- (i) Actions Needed to Implement. Identify the specific actions needed to fully implement the requirement. Include the submission of budget requests as an action where appropriate. Identify the organization responsible for implementing each action and provide milestones and schedules. If implementation is expected to take many months and multiple years, provide interim as well as ending milestones. The interim milestones give the contractor and ORO a basis for assessing performance in complying with the longer term requirements.

Duration schedules rather than fixed dates may be provided for items that need additional resources or that are dependent on completion of other actions (e.g., six months from receipt of funding or two months from completion of Phase II of the Safety Analysis Report). Fixed date schedules must be provided for actions with sufficient resources that are not dependent on other actions. A sample format is provided below.

<u>Activity</u>	<u>Responsibility</u>	<u>Start/End</u>
Revise SPP-XXX to include inspection of fire dampers	Fire Protection Div.	Start 01/15/1998 End 03/30/1999

When appropriate, provide attachments containing drawings, plans, calculations, procedures, test results, relevant history of the system, and any other supporting information.

- (j) Additional Resources Needed. If no additional resources are needed, the IP must so state. The resource impacts of the corrective actions must be broken out by:
- C Organization or Business Unit, if applicable;
  - C What is funded and what is not (by program/funding source);
  - C Whether or not the resources are included in the ES&H Management Plan; and
  - C Whether any of the needed funds are included in an approved budget request.

Budget requests must be submitted for all unfunded actions included in an approved IP. If the budget request is denied and the IP relates to implementation of an S/RID or WSS standard/requirement, the contractor must revise the IP to so state and describe whether funding will be requested the following year or if an alternate corrective action is planned. If corrective actions are to be completed by reallocating amounts already funded, describe what other scheduled activities will not be completed because of the reallocation. The COR must approve any reallocation of existing funds. If the actions in another IP are or will be affected, identify the IP and attach a copy.

- (k) Justification for Approval or Continued Operation. Referring to specific activities, explain why it is acceptable to continue operating while in noncompliance with the requirement(s). If appropriate, discuss how the existing or planned compensatory measures contribute to this conclusion. Describe the nature and results of any tests or analyses conducted to support these conclusions.

The justification for approval may refer to any type of net benefit arising from the approval, including avoidance of costs, reduction in risk to workers and the public, improved operational efficiency, etc. Discuss other factors or risks associated with approval or disapproval, such as exposure to possible legal action during the period of noncompliance.

- (l) List of Attachments. Self-explanatory.
  - (m) Contractor Approvals. Provide the internal contractor approval sheet that shows that the IP has received internal review and approval before submission to ORO.
  - (n) Technical Point of Contact. Include a contact name and telephone number for a person or persons who can answer detailed technical questions about the IP.
- (4) Implementation Plan Review and Approval Cycle. The contractor need not wait for formal DOE approval and should begin working the funded portions of an IP as soon as it is submitted. If questions arise or if there is a need for direction on specific implementation actions before DOE approval is granted, submit these issues to the COR. ORO uses the following review and approval process:
- (a) The contractor submits the IP to the COR, with a copy to the DMG.
  - (b) The DMG formally transmits the IP and a Comment/Concurrence Form to the COR. The DMG also sends a courtesy copy of the IP to the DPI. (See Attachment 2, Comment/ Concurrence Form – Implementation Plan).

- (c) Although the DPI's formal concurrence in IPs is no longer a requirement, the DPI may elect to review the IP and provide any comments to the COR, with a copy to the DMG.
- (d) The COR provides the completed Comment/Concurrence Form to the DMG by the requested target date.
- (e) After receipt of the Comment/Concurrence Form from the COR the DMG develops the ORO approval or rejection letter for the COR's signature.

**NOTE:** If ORO is the approval authority for the IP, the plan is automatically approved if ORO does not respond to the contractor within 180 calendar days from the date the IP is received by the COR and the DMG.

- (f) If the IP requires DOE HQ approval, the DMG prepares the transmittal letter to DOE HQ and obtains appropriate concurrences.
  - (g) The DMG tracks the status of the IPs and posts the tracking data on the DMG Home Page.
- (5) Revising Implementation Plans. Contractor IP preparers must make requested changes and submit revised plans within 30 calendar days of receipt of the ORO change request or as directed in the COR's letter. Contractors submit revised IPs to the COR, with a copy to the DMG. Revised plans are reviewed and approved in the same manner as the original plan.

A revised IP is also required when the contractor makes substantive changes to an IP because of changing conditions or because of inability to meet deadlines established in the IP. The letter transmitting the revised IP must briefly explain the reason for the revision. If the revision is due to inability to meet an established deadline, the revised IP must be submitted before the existing commitment date is missed.

Contractors must not delete uncompleted actions from an IP between one revision and the next. If multiple revisions of a plan are involved, completed items must be noted as such in at least one revision before being deleted.

**NOTE:** If the contractor and COR agree on a different method for making revisions (e.g., change page), then the method must be documented, approved by the COR, and a copy provided to the DMG.

(6) Closing Implementation Plans.

- (a) Contractors send a letter to the COR, with a copy to the DMG, requesting closure and stating that the corrective actions in the IP have been completed. Any ongoing activities are noted in the letter.
- (b) The DMG formally transmits the closure request to the COR with a copy of the IP and a Comment/Concurrence Form. The DMG provides a courtesy copy to the DPI. (See Attachment 3, Comment/Concurrence Form – Implementation Plan Closure.)
- (c) On receipt of the completed Comment/Concurrence Form, the DMG prepares the rejection or approval letter for the COR's signature.
- (d) The DMG tracks the status of closure requests and posts the tracking data on the DMG Home Page.

6. REFERENCES.

- a. DOE-STD-1082-94, PREPARATION, REVIEW, AND APPROVAL OF IMPLEMENTATION PLANS FOR NUCLEAR SAFETY REQUIREMENTS, dated October 1994, which contains nonmandatory guidance on the content and format of IPs.
- b. DEAR 970.5204-2 (formerly DEAR 970-5204-78), *Laws, Regulations, and DOE Directives* (Dec 2000).
- c. DOE M 251.1A, DIRECTIVES SYSTEM, dated January 30, 1998.

7. DEFINITIONS. None.

8. CONTRACTOR REQUIREMENTS DOCUMENT. See Contractor Requirements Document, Attachment 1 of this chapter.

9. ATTACHMENTS.

Attachment 1 - Contractor Requirements Document.

Attachment 2 - Comment/Concurrence Form – Implementation Plan

Attachment 3 - Comment/Concurrence Form - Implementation Plan Closure

**CONTRACTOR REQUIREMENTS DOCUMENT**

1. As required by their contract, ORO contractors are required to prepare IPs for new and revised standards/requirements placed in their contract (i.e., list of administrative directives in the CRB, WSS set, or S/RID) if they cannot come into compliance within existing funding and/or within 180 calendar days. These plans must meet the requirements of paragraph 5 of this chapter. The 180-day due date for the IP is calculated as follows:
  - C When the contractor cannot fully implement new or revised administrative requirements within existing funds and/or within 180 calendar days from the date of the COR's letter requesting an impact assessment.
  - C When the contractor cannot fully implement new or revised S/RID or WSS requirements within existing funds and/or within 180 calendar days from the date the standard/requirement is formally approved for inclusion in the S/RID or WSS via COR letter.

Contractors submit IPs and closure requests to the COR, with a copy to the DMG.

2. A compliance line is included in the CRB with the directive for which an IP is required stating the date the IP is due, updated when the IP is approved, and deleted when the IP is closed. See Chapter VIII, REQUIREMENTS CHANGE NOTICES.
3. After a WSS set is placed in the contract, the contractor must review all open DOE Directive IPs. This review determines if any planned corrective actions should be revised or dropped because the requirement(s) is no longer in the WSS set or has been rewritten in such a way as to change the corrective action needed to bring the contractor into compliance. Within 90 calendar days of approval of the WSS set, the contractor must notify the DMG in writing, with a copy to the COR, which items remain open and which are requested to be closed or revised.

**CONTRACTOR NAME  
COMMENT/CONCURRENCE FORM  
IMPLEMENTATION PLAN APPROVAL**

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**PART A** (To be completed by the Directives Management Group, AD-440)

**TO:** [COR]

**SUBJECT ORDER:** [directive number and title]

The attached implementation plan is forwarded for review. Complete Part B and fax this form to Wayne Albaugh, AD-440, by [due date] at 576-4046.

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**PART B** (To be completed by the COR) **NOTE:** Review of IPs should be made by experts most familiar with the contractor's programs in the subject matter area. Complete "walkdowns" of assessment information to ensure agreement with the contractor's conclusions is not expected.

**CONCURRENCE:** (Check One). **NOTE:** Concurrence signifies agreement with the assumptions provided and the approach proposed for reaching compliance. Concurrence does **not** indicate a funding commitment.

Yes \_\_\_ = Concurrence with the implementation plan in its entirety

No \_\_\_ = Nonconcurrence. Identify specific revisions desired. Attach extra sheets if necessary.

**IDENTIFY CONTACT POINT:** [COR's staff person]

Name

Telephone

**SIGNED:** \_\_\_\_\_

Signature of COR

Date

**CONTRACTOR NAME  
COMMENT/CONCURRENCE FORM  
IMPLEMENTATION PLAN CLOSURE**

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**PART A** (To be completed by the Directives Management Group, AD-440)

**TO:** [COR]

**SUBJECT ORDER:** [directive number and title]

The attached closure request for the implementation plan is forwarded for review. Complete Part B and fax this form to Wayne Albaugh, AD-440, by [due date] at 576-4046.

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**PART B** (To be completed by the COR): **NOTE:** Review of completed IPs should be made by experts most familiar with the contractor's programs in the subject matter area. Complete "walkdowns" of assessment information to ensure agreement with the contractor's conclusions is not expected.

**CONCURRENCE:** (Check One).

Yes \_\_\_ = Concurrence with closing the plan.

No \_\_\_ = Nonconcurrence. Identify specific objections. Attach extra sheets if necessary.

**IDENTIFY CONTACT POINT:** \_\_\_\_\_  
Name Telephone

**SIGNED:** \_\_\_\_\_

Signature of COR

Date