RL/REG-97-13
Revision 10

OFFICE OF RIVER PROTECTION POSITION ON CONTRACTOR-INITIATED CHANGES TO THE AUTHORIZATION BASIS

December 2003

U.S. Department of Energy
Office of River Protection
PO Box 450, H6-60
Richland, WA 99352

Approved: _____

Date: _____

PREFACE

As directed by Congress in Section 3139 of the *Strom Thurmond National Defense Authorization Act for Fiscal Year 1999*, the U.S. Department of Energy (DOE) established the Office of River Protection (ORP) at the Hanford Site to manage the River Protection Project (RPP), formerly known as the Tank Waste Remediation System. ORP is responsible for the safe storage, retrieval, treatment, and disposal of the high level nuclear waste stored in the 177 underground tanks at Hanford.

The initial concept for treatment and disposal of the high level wastes at Hanford was to use private industry to design, construct, and operate a Waste Treatment and Immobilization Plant (WTP) to process the waste. The concept was for DOE to enter into a fixed-price contract for the Contractor to build and operate a facility to treat the waste according to DOE specifications. In 1996, DOE selected two contractors to begin design of a WTP to accomplish this mission. In 1998, one of the contractors was eliminated, and design of the WTP was continued. However, in May 2000, DOE chose to terminate the privatization contract and seek new bidders under a different contract strategy. In December 2000, a team led by Bechtel National, Inc. was selected to continue design of the WTP and to subsequently build and commission the WTP.

On January 10, 2001, the U.S. Department of Energy published the revised Nuclear Safety Management rule, 10 CFR 830. This rule, in Subpart B, "Safety Basis Requirements," established specific requirements for the establishment and maintenance of the safety basis of DOE nuclear facilities, including the WTP project.

A key element of the WTP is DOE regulation of safety. The mission of removal and immobilization of the existing large quantities of tank waste by the WTP Contractor must be accomplished safely, effectively, and efficiently.

The DOE principles of integrated safety management were built into the regulatory program for design, construction, operation, and deactivation of the facility. The regulatory program for nuclear safety permits waste treatment services to occur on a timely, predictable, and stable basis, with attention to safety.

A key feature of this regulatory process is its definition of how the standards-based integrated safety management principles are implemented to develop a necessary and sufficient set of standards and requirements for the design, construction, operation, and deactivation of the WTP facility. This process meets the expectations of the DOE necessary and sufficient closure process (subsequently renamed Work Smart Standards process) in DOE Policy 450.3, *Authorizing Use of the Necessary and Sufficient Process for Standards-based Environment, Safety and Health Management*, and is intended to be a DOE approved process under DOE Acquisition Regulations, DEAR 970.5204-2, *Laws, Regulations and DOE Directives*, Section (c). DOE approval of the contractor-derived standards is assigned to the Manager, ORP.

The WTP Contractor has direct responsibility for WTP safety. DOE requires the Contractor to integrate safety into work planning and execution. This integrated safety management process emphasizes that the Contractor's direct responsibility for ensuring that safety is an integral part of mission accomplishment. DOE, through its safety regulation and management program, verifies that the Contractor achieves adequate safety by complying with approved safety requirements.

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RECORD OF REVISION

Document Title: ORP Position on Contractor-Initiated Changes to the Authorization Basis

Document Number: RL/REG-97-13

Revision Date	Revision Number	Reason for Revision
11/24/97	0	Original issue.
11/24/97	1	Fixed typographical errors. Added reference to applicable DOE regulations with regard to processing Changes to the Radiation Protection Program and Quality Assurance Program.
12/05/97	2	Fixed typographical errors
03/31/98	3	An endnote was included in the "Authorization Basis" definition to clarify that documents included in the authorization basis may be superceded by documents in subsequent regulatory submittals. The definition of "Changes" was clarified. The definition was modified and an endnote was added to clarify that Changes that might affect information or commitments made in the authorization basis, but are not explicitly identified in the authorization basis, need to be checked for consistency with authorization basis. Clarified that "safety triad" conformance certification is required for Changes made to the SRD, not the SRD in its entirety.
09/15/98	4	The definition of "Authorization Basis" was modified. Included a statement indicating that the Authorization Basis includes that information requested by Contractor for inclusion in the Authorization Basis and subsequently accepted by the RU.
04/15/99	5	The paper was reformatted and converted to MS Word – No Changes made to RU positions.
04/11/00	6	Made Changes to allow implementation of the contractor's "proceed-at-risk" authorization basis maintenance proposal (ref: 00-RU-0257). Added new position regarding the content of safety evaluations.
07/20/00	7	Incorporated Contractor editorial comments on Revision 6 (Ref: 00-RU-0257). Revised definition of "USQ" to conform to Revision 1 of governing documents glossary.
3/8/02	8	Changes to split apart facility, administrative control and SRD changes , and provide criteria for facility change threshold during construction.
9/6/02	9	Changes to the Authorization Basis must be updated annually for administrative controls changes and to

		facility changes of low safety significance. The Contractor may now make all changes to the administrative controls described in the Authorization Basis without prior DOE approval, with certain conditions. Revised Title to reflect ORP. Updated Contractor-suggested definitions
12/20/03	10	Eliminated ABCN discussion and replaced it with a streamlined methodology. PSAR and ISMP update now required only once per two years. Included limited case-by-case deviations for facility changes. Added the Appendix providing a summary of document positions.

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OFFICE OF RIVER PROTECTION POSITION ON CONTRACTOR-INITIATED CHANGES TO THE AUTHORIZATION BASIS

1.0 INTRODUCTION

The U. S. Department of Energy (DOE), Office of River Protection (ORP) positions described in this document are not requirements. These positions describe methods acceptable to the ORP for evaluating and implementing Contractor-initiated changes to the authorization basis. In particular, the River Protection Project Waste Treatment and Immobilization Plant (WTP) Contractor has the responsibility to establish an appropriate standard for evaluating and implementing Contractor-initiated changes in the Safety Requirements Document (SRD). The process for performing such changes is expected to be detailed in the Integrated Safety Management Plan. Conformance with the positions described in this document does not alter the Contractor's responsibility for ensuring that standards established or identified in the SRD will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

The WTP regulatory process involves multiple steps of Contractor submittals and specific regulatory actions. Contractor submittals provide the information and commitments that serve as the basis for regulatory decisions taken by the ORP in connection with regulatory actions and establish the authorization basis. The existence of an authorization basis started with Standards Approval, which was the first regulatory action.

The authorization basis is not just relevant to specific ORP decisions but also serves several functions following the completion of a specific regulatory action. The authorization basis describes the safety basis for the facility and is the benchmark used to evaluate the safety implications of changes made to a Contractor's facility design, operations, or administrative controls. The SRD portion of the authorization basis identifies the standards which the Contractor uses to design, construct and operate the facility and against which the ORP assesses Contractor performance during each stage of the regulatory process. The importance of the authorization basis to these ongoing activities and the need to maintain a credible safety basis for the facility, requires that the authorization basis be maintained. For changes to the SRD, the SRD must be maintained current so that both the Contractor and the ORP clearly understand what it is at any point in time. For potentially significant facility changes in the authorization basis, ORP approval of the change before its implementation is essential to ensure adequate nuclear safety is maintained. The authorization basis for other facility changes and administrative controls changes is not updated as these changes are made, but periodically (at least biennially). The Contractor must keep records of all changes for periodic ORP oversight.

As a fundamental precept underlying this position paper, the ORP expects the Contractor to be responsible for performing work safely by meeting the provisions of adequate safety, complying with all applicable rules and regulations, and conforming to the top-level standards and principles. The ORP action of Standards Approval included both (1) the approval of the Contractor-recommended set of radiological, nuclear, and process safety standards and requirements, and (2) the approval of the Contractor's integrated safety management processes ensuring safe performance of work. Contractor-initiated changes to both the standards and the integrated safety management program are addressed in this position paper.

The maturation of the Contractor's facility design and activities, and other changing conditions, result in a need to establish a process for the Contractor to make changes to the authorization basis and to change that may significantly affect nuclear safety. This process needs to balance the WTP regulatory principle of efficiency with assurance that adequate safety will not be compromised. The ORP position regarding Contractor-initiated changes was developed to conform with these program requirements and with the applicable portions of DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*.

2.0 DEFINITIONS

Authorization Basis: The composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the ORP grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by the ORP. Examples of such information include:

1. The information submitted in connection with a request for Standards Approval, a request for Construction Authorization, a request for Operations Authorization, or an Initial Safety Assessment. This includes the information associated with the requests as described in DOE/RL-96-0003, *DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, and any other information submitted by the Contractor in connection with the requests.[1]

2. Amendments to the information described above that are on the Contractor docket. Such amendments may be in the form of revisions to previously submitted documents, or new information that supplements previously submitted information.

3. Approved Authorization Basis Amendment Requests (ABAR) as described in Section 3.6.

The authorization basis began at the Standards Approval regulatory action and continues throughout the design, construction, operation, and decommissioning of the WTP facility.

Change(s): Change(s) to the facility, to the administrative controls or to the SRD that are described in the authorization basis or relied upon by the Contractor to ensure conformance to the authorization basis.[2]

Facility: As used above in the Change(s) definition, "facility" refers to the physical facility, the hazards and safety analysis of the facility, and the work at the facility that is enveloped by the analyses. The facility is described in the authorization basis by information such as; the site

[1] Documents submitted to the ORP in connection with a regulatory action may be superceded by documents submitted in subsequent regulatory actions. For example, the Preliminary Safety Analysis Report submitted in a Construction Authorization request may be superceded by a Final Safety analysis Report submitted in an Operations Authorization Request. The Contractor may request that information and commitments made in superceded documents be removed from the authorization basis.

[2] Included within the scope of "Change(s)" are those items that are not explicitly described in the authorization basis, but which if modified or deleted, would cause a deviation from commitments contained in the authorization basis.

description, design information, hazard analysis information, safety analysis information, and descriptions of facility operations, tests, and experiments. While the SRD contains regulatory information that affects design, it is not part of the definition of "facility" as used in this document.

Administrative Controls: As used above in the Change(s) definition, "administrative controls" refers broadly to the approved management and administrative processes associated with managing, designing, building, or operating the facility. Administrative controls are described in the authorization basis by information such as the descriptions of procedures, programs, plans, and management processes.

Authorization Basis Amendment Request (ABAR): The ABAR is a Contractor-submitted change to the authorization basis or to the facility design submitted to DOE for approval. The ABAR contains a description of the authorization basis change or design change, a reason for the change, an implementation schedule for the change, a copy of the actual page changes, and a copy of the associated safety evaluation.

Design Basis Event (DBE): Postulated events providing bounding conditions for establishing the performance requirements of structures, systems and components that are necessary to: (1) ensure the integrity of the safety boundaries protecting the worker; (2) place and maintain the facility in a safe state indefinitely; or (3) prevent or mitigate the event consequences so that the radiological exposures to the general public or the workers would not exceed appropriate limits. The DBEs also establish the performance requirements of the structures, systems and components whose failure under DBE conditions could adversely affect any of the above functions.

Limited Scope Changes: Limited scope Changes, as used in Section 3.5, are those that do not involve major reorganizations of the Integrated Safety Management Plan or Preliminary Safety Analysis Report (PSAR), or that broadly affect these documents (for example, increasing the height of the High Level Waste Building was not a limited scope Change).

Safety Requirements Document (SRD): A document that contains the approved and mandated set of radiological, nuclear, and process safety standards and requirements which, if implemented, provides adequate protection of workers, the public, and the environment against the hazards associated with the operation of the Contractor's facilities. The SRD was first approved as part of the Standards Approval regulatory action.

Safety Design Class (SDC): Structures, systems, and components (SSCs) that, by performing their specified safety function, prevent workers or the maximally exposed member of the public from receiving a radiological or chemical exposure that exceeds the exposure standards defined in the Safety Requirements Document. Those features credited for the prevention of a criticality event are also designated as SDC. Functional requirements for SDC SSCs are described in Chapter 4 of the safety analysis report as are descriptions of how the SSC meets its respective safety function.

Safety Class (SC) Structures, Systems and Components: The structures, systems, or components, including portions of process systems, whose preventive or mitigative function is necessary to limit radioactive hazardous material exposure to the public, as determined from safety analyses.

Safety Significant (SS) Structures, Systems and Components: The SSC which are not designated as safety class structures, systems, and components, but whose preventive or mitigative function is a

major contributor to defense in depth and/or worker safety as determined from safety analyses.

Safety Function: Any function that is necessary to ensure: (1) the integrity of the boundaries retaining the radioactive materials; (2) the capability to place and maintain the facility in a safe state; or (3) the capability to prevent or mitigate the consequences of facility conditions that could result in radiological exposures to the general public or workers in excess of the appropriate limits.

Start of Cold Testing: Refers to that point in the construction phase of each facility of the WTP program during start-up testing prior to admitting any significant quantities of radioactive waste or process chemicals into the facility. This milestone will be established in the Construction Authorization Agreement.

Significant Facility Design Change: A potentially significant facility design change is a design change that meets one of the following:

1. Creates a new DBE.

2. Results in more than a minimal increase in the frequency or consequence of an analyzed DBE as described in the Safety Analysis Report.

3. Results in more than a minimal decrease in the Safety Functions of important-to-safety SSC.

4. Changes how a safety design class (SDC) SSC meets its respective safety function.

5. Changes how a safety class or safety significant SSC meets its respective safety function.

Technical Safety Requirement (TSR): Those requirements that define the conditions, the safe boundaries, and the management or administrative controls necessary to ensure the safe operation of the facility, reduce the potential risk to the public and facility workers from uncontrolled releases of radioactive materials, and from radiation exposures due to inadvertent criticality. The TSRs are approved as part of the Production Operations Authorization regulatory action.

3.0 POSITION

3.1 The processes associated with evaluating and implementing Change(s) are, themselves, important-to-safety. Accordingly, Contractor evaluation and implementation of Change(s) shall be accomplished:

a. By qualified personnel.

b. In accordance with procedures developed and approved under the Contractor's procedure process.

c. Under the Contractor's approved Quality Assurance Program (QAP).

3.2 The Contractor may make Change(s) if a review is performed and:[3]

a. The review demonstrates a proposed Change(s) is consistent with the existing authorization basis; or

b. The authorization basis is revised consistent with the Change prior to implementation of the proposed Change(s); or

c. The Contractor may make Changes(s) to the Facility and to Administrative Controls without changing the authorization basis provided the requirements of Section 3.5 below are followed, or

d. The Contractor may authorize Change(s) to the Facility that deviate from the Facility description in the authorization basis if the associated Change(s) are implemented in accordance with a Contractor safety management process that is consistent with Position 3.7.

3.3 Revisions to the authorization basis that involve a Change(s) to the QAP shall be accomplished in accordance with the provisions of 10 CFR 830.121 and the QAP that implements the rule.

3.4 Revisions to the authorization basis that involve a Change(s) to the Radiation Protection Program shall be accomplished in accordance with the provisions of 10 CFR 835 and the Radiation Protection Program that implements the rule.

3.5 Change Methodology for Facility, Administrative Controls and ISMP Changes. Changes to the facility and associated nuclear safety controls that may affect the authorization basis, that are of limited scope, and that are not potentially significant design changes (as defined in Section 2.0) may be made without prior DOE approval using the methodology described below.

a. The Contractor will perform a safety evaluation of all such Changes prior to implementation of the changes. Each such safety evaluation must determine, prior to implementing the Change, that the Change complies with all applicable laws and regulations, conforms to the SRD, and provides adequate safety.[4] For Changes affecting the authorization basis, DOE may require Changes to be rescinded and corrected to comply with the applicable requirement if it determines that the justification for the Change contained in the safety evaluation was insufficient. If the Change does not conform to the SRD, then an SRD change must be approved prior to implementing the Change in accordance with Section 3.6 or Section 3.7, or except

[3] This position is based on the assumption that it is possible for any change to potentially affect the authorization basis. This position should not be used to preclude the contractor from establishing a class of structures, systems, and components or administrative features for which changes do not have the possibility of affecting the authorization basis and, therefore, would not require such a safety evaluation.

[4] For purposes of this agreement, all safety evaluations should be documented in sufficient detail such that a knowledgeable individual reviewing the safety evaluation can identify the technical issues considered during the safety evaluation and basis for determination. The format, content and level of detail associated with an acceptable safety evaluation is highly dependent on the nature of the proposed Change.

as allowed by Section 3.5.e.

b. The Contractor will maintain records of Changes to the facility, including the corresponding safety evaluations. The Contractor will provide DOE a list of the safety evaluations issued each month. The list will contain the safety evaluation number, its title containing a brief description of the Change and date of issuance.

c. Potentially significant facility design Changes must be made under Section 3.6.

d. The Contractor may not make revisions to the SRD Safety Criteria without prior ORP approval. The Contractor may not make Changes to the SRD Implementing Codes and Standards without prior ORP approval, except as described in Section 3.7.

e. Facility case-by-case non-compliances with SRD implementing codes and standards[5] with narrow application may be made under Section 3.5 provided a safety evaluation is transmitted to DOE within 30 days of identification of the non-compliance or determination of the need for the non-compliance. The safety evaluation shall conclude that the deviation complies with all applicable laws and regulations, conforms to the SRD safety criteria, and provides adequate safety. All facility non-compliances from the SRD shall be specifically documented, tracked and maintained using appropriate quality procedures and documents, and contain the supporting safety evaluation and reason for the non-compliance. These documents shall be auditable and readily accessible. A non-compliance would (1) involve work not yet initiated that would impact cost or schedule if not done on a timely basis, or (2) work already completed if re-work would impact cost or schedule. DOE may require a non-compliance to be corrected to comply with the applicable requirement if it determines, within 60 days of written notification, that the justification for the non-compliance was insufficient.

f. For the Changes made under Section 3.5, the Contractor will update the authorization basis (PSAR or the ISMP) at least every two years, commencing in September 2003, if Changes have been made in the prior two years that affect the PSAR or the ISMP. This update will be submitted to ORP for approval.

3.6 Authorization Basis Amendment Requests (ABAR)

If the Change(s) does not meet the conditions of approval in Position 3.5, ORP approval is required. An authorization basis revision that requires the approval of ORP prior to implementation may be implemented following approval by the ORP of a request to amend the authorization basis. An amendment request, submitted to ORP by means of an ABAR, shall include the following:

a. A description of the proposed revision.

b. A reason for the proposed revision.

[5] For the purposes of this document "SRD implementing codes and standards" is meant to include all SRD Appendixes designated as "implementing standards," except Appendixes A, B, D and K.

c. A description of the proposed implementation schedule for the revision and associated Change(s).

d. A copy of the authorization basis document or appropriate excerpt showing the proposed revision.

e. A safety evaluation of the proposed revision as described in Position 3.5.a as applicable for the type of Change(s).[6]

f. If the revision involves the deletion or modification of a standard previously identified in the approved SRD, certification that the revised SRD will identify a set of standards that will continue to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards[7].

g. The SRD will be updated for SRD Changes made under Section 3.6 within 30 days of Contractor receipt of ORP approval of the ABAR Change request. For facility Changes made under Section 3.6, the Contractor will update the authorization basis (PSAR) every two years, commencing in September 2003, if Changes have been made in the prior two years. This update will be submitted to ORP for approval.

3.7 Authorization Basis Deviations

Prior to the Start of Cold Testing, for Change(s) to the Facility that deviate from the Facility description in the authorization basis that must be made under the provisions of Position 3.6 or for changes to SRD Implementing Codes and Standards that potentially affect cost or schedule, the Contractor may make these Changes without prior ORP approval provided that:

a. The Contractor has performed an evaluation and determined the following:

1. Conformance with applicable laws and regulations, top level standards and principles, and SRD safety criteria is maintained.

2. The specific Change(s) to be authorized do not cause or threaten imminent danger to the workers, the public, or the environment from radiological, nuclear, or chemical hazards.

b. The specific Change(s) that will deviate from the authorization basis have been identified.

[6] For SRD Changes, the safety evaluation must demonstrate conformance to Top-level Standards (DOE/RL-96-0006) rather than conformance to the SRD.

[7] As noted in a preceding footnote, the format, content, and level of detail associated with an acceptable "safety evaluation" is highly dependent on the nature of the proposed Change. If a proposed SRD Change potentially results in less protection of workers, the public or the environment against the hazards associated with the operation of the facility, the safety evaluation for this Change should follow the process outlined in DOE/RL-96-0003, DOR/RL-96-0004 and DOR/RL-96-0006.

c. The Contractor's process for implementing the Change(s) is consistent with the documentation and administrative controls described in Position 3.8.

d Delay of implementation of the Change(s) could affect cost or schedule.

3.8 Specific Change(s) identified in Position 3.7.b may be made provided that the following documentation specifications and administrative controls are implemented.

a. The deviation from the authorization basis shall be clearly documented and approved prior to implementing any associated Change(s). Documentation shall include the following:

1. Identification of the specific Change(s) authorized.

2. The evaluation described in Position 3.7.a.

3. The signature of Contractor manager(s) designated with the authority to approve Change(s) under this section and the date such Change(s) were approved.

b. All Change(s) implemented under this provision that deviate from the authorization basis shall be specifically documented and tracked as deviations using appropriate quality procedures and documents.

c. During the WTP construction phase, the Contractor shall notify the ORP of each Contractor-approved deviation from the authorization basis:

1. Either verbally or in writing within 24 hours

2. In writing including a copy of the Contractor's approval as documented in Position 3.8.a above, within 3 working days.

d. As soon as practical but not later than 30 days following the decision to deviate from the authorization basis (as recorded in Position 3.8.a.) an ABAR that will resolve the deviation from the authorization basis shall be approved by the Contractor and submitted to the ORP under the provisions of Position 3.6.

e. ORP approval of amendment requests submitted per Position 3.8.d shall be obtained within 90 days of the Contractor's approval of these Change(s) (as recorded in Position 3.8.a).

f. If time limits specified in Position 3.8.d or Position 3.8.e are not met then:

1. All physical work associated with implementing the authorized Change(s) (as documented in Position 3.8.a) shall stop.

2. Corrective action shall be immediately taken to promptly correct the deviations documented under Position 3.8.b.

g. The Contractor's processes and records for implementing these Change(s) shall be auditable and readily accessible. Specifically:

1. Documentation related to the approval of Deviations from the authorization basis and associated Change(s) shall be readily retrievable by the Contractor and made available upon request to the ORP for inspection.

2. A current status report of deviations from the authorization basis and related Change(s), and related Contractor documents shall be readily available upon request to the ORP for inspection.

h. All revisions to the authorization basis associated with authorization basis deviations shall be completed, documented under Position 3.8.b., and resolved prior to Start of Cold-Testing.

4.0 REFERENCES

10 CFR 830 Subpart A, "Quality Assurance Requirements," *Code of Federal Regulations*, as amended.

10 CFR 835, "Occupational Radiation Protection," *Code of Federal Regulations*, as amended.

DOE/RL-96-0003, *DOE Process for Radiological, Nuclear, and Process Safety Regulation of the RPP Waste Treatment Plant Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

DOE/RL-96-0006, *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for the RPP Waste Treatment Plant Contractor*, U.S. Department of Energy, Office of River Protection, 2001.

Integrated Safety Management Plan, 24590-WTP-ISMP-ESH-01-001, Bechtel National, Inc., 2002.

Safety Requirements Document, 24590-WTP-SRD-ESH-01-001-02, Bechtel National, Inc., 2002.

5.0 LIST OF TERMS

ABAR	Authorization Basis Amendment Request
DBE	Design Basis Event
DOE	U.S. Department of Energy
ISMP	Integrated Safety Management Plan
ORP	Office of River Protection
PSAR	Preliminary Safety Analysis Report
QAP	Quality Assurance Program
SC	Safety Class

SDC	Safety Design Class
SRD	Safety Requirements Document
SS	Safety Significant
SSC	systems, structures and components
TSR	Technical Safety Requirements
WTP	Waste Treatment and Immobilization Plant

APPENDIX - SUMMARY OF DOCUMENT POSITIONS, RL/REG-97-13, Rev. 10

Type of change	Does the Contractor do a Full Safety evaluation Prior to Implementation?	Does the Contractor do an ABAR prior to implementation or at all?	Does ORP have to approve change prior to implementation or at all?	Does the AB have to be updated within 30 days?	Does the AB have to be updated within every 2 years?
ISMP and Administrative Controls Section 3.5	Yes	No	No	No	Yes
Facility, low safety significance Section 3.5	Yes	No	No	No	Yes
Facility, low safety significance – non compliance with IC&S where correction of non compliance will impact cost or schedule Section 3.5.e	No, it has to be done within 30 days after implementation or identification and it has to be transmitted to ORP	No	No	No	Yes
Facility, high safety Significance Section 3.6	Yes	ABAR prior to implementation	Yes, change must be approved prior to implementation	No	Yes
Facility, high safety significance that need immediate approval to avoid cost or schedule impact Section 3.7	No, it has to be done within 30 days after implementation, a brief SE is done immediately	DTD immediately, then ABAR in 30 days	Yes, change must be approved within 90 days of implementation	No	Yes
SRD IC&S Section 3.6	Yes	ABAR prior to implementation	Yes, change must be approved prior to implementation	Yes	NA
SRD IC&S that need immediate approval to avoid cost or schedule impact Section 3.7	No, it has to be done within 30 days after implementation, a brief SE is done immediately	DTD immediately, then ABAR in 30 days	Yes, change must be approved within 90 days of implementation	Yes	NA
SRD Safety Criteria Section 3.6	Yes	ABAR prior to implementation	Yes, change must be approved prior to implementation	Yes	NA