

BNFL, Inc.

Standards Approval Review

Planning Handbook

Submitted: _____
Review Team Leader/Requirements and Standards Official

Approved: _____
Regulatory Official

August 27, 1997
Revision A

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1. Purpose

This **Handbook** describes the Office of Radiological, Nuclear and Process Safety Regulation (a.k.a., Regulatory Unit's [RU's]) methodology for reviewing the BNFL, Inc. (BNFL) Standards Approval Package submittal (hereafter referred to as the submittal). This methodology includes:

- Review Team Charter
- Review Team Roles and Responsibilities
- Review Schedule
- Team Members Qualifications
- Team Orientation
- Team Logistics
- Review Process Description
- Safety Evaluation Report Preparation
- Lessons-Learned Development.

This handbook is intended to be used with the associated review guidance documents developed by the RU (hereafter referred to as guidance). This guidance includes the:

- *Guidance for the Review of TWRS Privatization Contractor Integrated Safety Management Plan Submittal Package*, RL/REG-97-07, Revision 0, June 25, 1997
- *Guidance for the Review of TWRS Privatization Contractor Safety Requirements Document Submittal Package*, RL/REG-97-08, Revision 0, June 26, 1997
- *Guidance for the Review of TWRS Privatization Contractor Initial Quality Assurance Program*, RL/REG-96-01, Revision 0, October 1996
- *Guidance for the Review of TWRS Privatization Employee Concerns Management System*, RL/REG-96-03, Revision 0, October 1996
- *Guidance for the Review of TWRS Privatization Contractor Radiation Exposure Standard for Workers*, RL/REG-97-09, August 12, 1997.

The RU developed the guidance to structure the review in accordance with the requirements of the Contract; therefore, the guidance does not modify the provisions of the Tank Waste Remediation Systems (TWRS) Privatization Contract. A copy of the BNFL contract (DE-AC06-96RL13308) is available in the RU Library. Review Team members (hereafter referred to as the Team) who identify any provisions of the guidance documents that appear to conflict with the Contract should promptly notify the Review Team Leader (RTL).

2. Review Team Charter

The Contract requires the RU to conduct a review of the BNFL Standards Approval Package submittal. The elements of the submittal are the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP). In conducting the review, the Team shall follow the guidance of RL/REG-97-07 and RL/REG-97-08. At the conclusion of the review, the Team shall prepare a Safety Evaluation Report (SER) documenting the RU findings. According to the Contract, the RU will:

“Review the submittal for completeness and adequacy within one week from the day of its receipt. Upon completing the review, issue a notice to the Contractor in writing of the acceptability of the submittal. If the submittal is rejected, list the reasons for the rejection and the necessary corrective actions. After the Team accepts the submittal for review, the Team may request additional information from the Contractor to clarify or supplement material in the submittal.

If the submittal is sufficient to proceed with the review process and if the Contractor supports the process with written responses to prepared questions and a discussion meeting, according to the reference schedule, the SRD and ISMP approvals will be issued by the Director of the RU in a total elapsed time of 14 weeks.”

Team members should read and study the guidance and apply it to the review. The guidance is not all inclusive. Team members are encouraged to use their experience and professional judgment. If significant discrepancies are identified with the guidance, the Team member should discuss these problems promptly with the RTL.

Upon completion of each Team member’s review, written proposed findings and observations are communicated to the RTL by each team member in his/her area of responsibility. Documentation of the findings and observations should be timely, clear, and concise.

The content of the SER will be based on the consensus findings and observations of the Team. The RTL will submit the SER, along with a recommendation to approve or disapprove the submittal, to the Regulatory Official (RO).

3. Roles and Responsibilities

3.1 *Regulatory Unit Official*

The Regulatory Official (RO [Dr. D. C. Gibbs]):

- Approves the Standards Approval Planning Handbook (this document).
- Assigns the RTL for the Standards Approval submittal review.
- Approves the reviewers from the RU core staff, the DOE complex, and other qualified contractors.
- Ensures independence of team members from the TWRS Program Official.

- Approves or disapproves the submittal and associated Safety Evaluation Report (SER).

3.2 Review Team Leader

The Review Team Leader (RTL [Mr. R. C. Barr]):

- Acts for the Requirements and Standards Official (RSO) and the Activity Authorization Official (AAO), in their absence, to conduct the Standards Approval submittal review.
- Identifies potential Team members and recommends Team constituency to the RO.
- Organizes and directs the review in accordance with this **Handbook**, DOE policy for the RU's activities, and RU Management Directives.
- Provides logistical support to the Team in accordance with this Handbook.
- Communicates interim Team questions to the **Privatization Contractor** concerning the submittal.
- Organizes Team member orientation.
- Develops review area assignments.
- Briefs the RO daily on progress of the review, emphasizing significant issues identified.
- Directs reviewers in the preparation of the SER, which supports the recommendation for approval or disapproval of the Standards Approval action.
- Identifies "lessons learned" with the Team at the conclusion of the review.

3.3 Assistant Team Leader

The Assistant Team Leader (ATL [Mr. C.L. Vanderniet]):

- Coordinates and monitors individual reviewer and activities subgroup progress.
- Reports Team schedule progress to the RTL on a daily basis.
- Organizes and conducts the daily team meeting to review significant issues, progress, and plans for the review.
- Organizes the preparation of assigned portions of the SER.
- Collects Team questions concerning the **Privatization Contractor** submittal and provides them to the RTL.

3.4 Review Team Administrative Assistant

The Review Team Administrative Assistant (Ms. J. J. Spargur):

- Tracks interim questions and resolutions from reviewers, as well as **Privatization Contractor** responses.

- Provides a summary listing of these issues to the Team on a daily basis.
- Provides clerical, logistic, and administrative support to the Team, as assigned.

3.5 Review Team Members

The Team Members:

- Prepare for the review by attending orientation, or alternatively, by self-study of the reference material provided by the RTL.
- Use the applicable guidance, the BNFL submittal, and applicable references to perform their review.
- Provide the RTL, or appropriate ATL, status reports as requested.
- Provide draft review findings and observations to the RTL or appropriate ATL in accordance with the review schedule.
- Provide written questions concerning potential weaknesses in the submittal to the ATL, or the RTL, in the daily Team meetings. These questions should be in the format described in Section 8.
- Resolve questions identified by the Team through discussion with **Privatization Contractor** personnel, review of submittals and responses to questions, and consideration of the applicable requirements.
- Document the rationale for the Team member's resolution of questions. This rationale must address the acceptability of the **Privatization Contractor's** response to the questions.
- Assist in the preparation of the SER, as assigned by the RTL.
- Participate in the "lessons learned" session at the conclusion of the review.

4. Schedule

4.1 Major Milestones

The major milestones for the review of the BNFL Standards Approval submittal are listed below. The dates listed must be adhered to in order to meet the 14-week schedule required by the *Regulatory Process for Radiological, Nuclear, and Process Safety for TWRS Privatization Contractors*, DOE/RL-96-0003, Revision 0, dated February 1996. Day zero is the day BNFL presents their Standards submittal to the public and the Regulatory Unit. The formal review of the BNFL submittal commences on September 29, 1997. Negative times indicate actions to be performed prior to start of the review. Each new calendar week begins on Monday, unless otherwise noted.

Reference Date	Calendar Week	Activity
-30 days	8/25/97 - 8/29/97	RU receives BNFL letter of intent to submit Standards Approval submittal. RU acknowledges receipt of BNFL letter of intent. Regulatory Official formally assigns R. Barr as Review Team Leader (RTL).
-5days	9/24/97 - 9/25/97	Review Team Orientation 2 days
Day 0	9/26/97	BNFL presents Standards submittal to the Team
Week 1	9/29/97 - 10/3/97	The Team completeness review is performed. At week's end, send letter to BNFL accepting or rejecting submittal for detailed review.
Week 2	10/6/97 - 10/10/97	Team begins detailed review of the BNFL SAP submittal.
Week 3	10/13/97 - 10/17/97	Team provides initial list of questions to BNFL with a copy to NRC. NRC provides questions on submittal to RU by week's end. Notice NRC/RU meeting (Week 5) to review NRC questions concerning submittal. Meeting may be closed due to competition sensitivity.
Week 4	10/20/97 - 10/24/97	The Team evaluates NRC questions. BNFL evaluates the Team's questions. Notice RU/Contractor meeting (Week 6) to discuss submittal questions and responses. Meeting noticed but may be closed due to competition sensitivity.

Reference Date	Calendar Week	Activity
Week 5	10/27/97 - 10/31/97	NRC/Review Team meeting at RL to discuss NRC's questions and determine which will be endorsed by the RU and forwarded to BNFL. Team provides second round of questions to BNFL by 10/31/97. BNFL continues evaluation of the Team's questions.
Week 6	11/3/97 - 11/7/97 11/6/97	Team begins drafting the Safety Evaluation Report. BNFL hosts discussion meeting to respond formally to the Team questions
Week 7	11/10/97 - 11/14/97	The Team continues drafting Safety Evaluation Report (SER). Notice public comment period for BNFL draft SER.
Week 8	11/17/97 11/21/97	The Team sends preliminary draft to NRC for comment. The Team finalizes draft SER.
Week 9	11/24/97	Public comment period begins on draft SER for the submittal. Copies sent to the public, so that both Standard Approval submittals can be released to the public. (BNFL submittal was received September 26, 1997.)
Week 10	12/1/97 - 12/5/97	Public comment period continues.
Week 11	12/8/97 12/8/97 - 12/12/97	Public comment period ends. The Team evaluates public and NRC comments on the SER.
Week 12	12/15/97 - 12/19/97	The Team reviews and resolves public and NRC comments.
Week 13	12/22/97 - 12/26/97	Resolved public and NRC comments are incorporated into draft SER. The Team prepares draft letter of transmittal for SERs. Send out for internal DOE review.
Week 14	12/29/97 - 1/2/98 1/2/98	The Team finalizes SERs and letter of transmittal for signature by RO. RU sends letter of transmittal and SER to BNFL with copies to the public and a courtesy copy to NRC.
Week 15	1/5/98 - 1/9/98	Lessons Learned session for all Team members as soon as possible after the review is complete.

4.2 Reviewer Selection & Qualifications

Each Team member will complete the one-page “Reviewer Credential Record” (Form 1), addressing their education, work experience, licenses, certifications, special skills, awards, and areas of expertise. All reviewers must also submit an “RU Nondisclosure/ Disclosure Agreement” (Form 2). Federal Employees are not required to complete the Nondisclosure portion of Form 2.

In consultation with the Requirements and Standards Official (RSO), Activities Authorization Official (AAO), and Regulatory Official (RO), the RTL will assign each reviewer to predetermined review areas based upon the Reviewer Team Credential Records, and any available supervisor recommendations. The preliminary review assignments will be provided to Team members during the Team orientation. Personnel who are unable to attend the orientation will be advised separately of their assignments. (Once the submittal has been received, and the capabilities of the respective Team members in relation to the submittal are more clearly defined, some changes in the assignments will likely occur.)

Form 1 Reviewer Credential Record

Office of Radiological, Nuclear, and Process Safety Regulation of TWRS Privatization Contractors	REVIEWER CREDENTIAL RECORD
Name:	Date:
<i>Organization/Address</i>	Telephone:
Areas of Expertise:	
Education (Degree/Major/School/Date):	
Licenses, Certifications, Special Skills, & Awards (License/Organization/Number/Date):	
Work Experience (Summarize):	
Reviewer's Signature	Date:
Regulatory Official Certification:	Date:

Form 1 (7/21/97)

Form 2 Nondisclosure and Disclosure Statements

Office of Radiological, Nuclear, and Process Safety Regulation of TWRS Privatization Contractors	NONDISCLOSURE AND DISCLOSURE STATEMENTS
Name:	Date:
Organization/Address :	Telephone:
Nondisclosure Statement	
In anticipation of my participation with the Office of Radiological, Nuclear, and Process Safety Regulation for TWRS Privatization Contractors (RU), I certify that I will not disclose any proprietary or competition sensitive information of the Contractors or DOE, to anyone who is not also authorized access to the information by law or regulation, except pursuant to the order of a court of competent jurisdiction.	
Signature:	Date:
Disclosure Statement	
Identify any direct financial interests (including stocks, bonds, or other financial interests) in, or past employment by the following companies (company - interest or employment dates):	
<p>Lockheed Martin Corporation, Advanced Environmental Systems</p> <ul style="list-style-type: none"> • Fluor Daniel, Inc. • NUMATEC (a Cogema, Inc./SGN Co.) • B&W Protec, Inc. (McDermott Company) • Los Alamos Technical Associates, Inc. • AEA Technology Eng. Services, Inc. • M4 Molten Metal Technology • Duke Engineering & Services • NUKEM • EnVitCo, Inc. • OHM Remediation Services, Corp. <p>BNFL, Inc.</p> <ul style="list-style-type: none"> • BNFL Engineering Ltd. • Science Application International Corp. • Savannah River Technical Center. • BNFL, Inc. • Bechtel National, Inc. • GTS Duratek 	
Signature:	Date:

Form 2 (7/21/97)

5. Reviewer Orientation

5.1 General

All reviewers are required to read the following documents:

- *Guidance for the Review of TWRS Privatization Contractor Integrated Safety Management Plan Submittal Package*, RL/REG-97-07, Revision 0, June 25, 1997
- *Guidance for the Review of TWRS Privatization Contractor Safety Requirements Document Submittal Package*, RL/REG-97-08, Revision 0, June 26, 1997
- *Guidance for the Review of TWRS Privatization Contractor Initial Quality Assurance Program*, RL/REG-96-01, Revision 0, October 1996
- *Guidance for the Review of TWRS Privatization Employee Concerns Management System*, RL/REG-96-03, Revision 0, October 1996
- *Guidance for the Review of TWRS Privatization Contractor Radiation Exposure Standard for Workers*, RL/REG-97-09, August 12, 1997.
- *Concept of the DOE Regulatory Process for Radiological, Nuclear, and Process Safety for TWRS Privatization Contractors*, DOE/RL-96-0005, Revision 0, February 1996.
- *DOE Regulatory Process for Radiological, Nuclear, and Process Safety for TWRS Privatization Contractors*, DOE/RL-96-0003, Revision 0, February 1996.
- *Memorandum of Agreement for the Execution of Radiological, Nuclear, and Process Safety Regulation of TWRS Privatization Contractors*, DOE/RL-96-26, Revision 0, July 3, 1996.
- *Memorandum of Understanding between the Nuclear Regulatory Commission and the Department of Energy*, January 29, 1997.
- *Policy for Radiological, Nuclear, and Process Safety Regulations for TWRS Privatization Contractors*, DOE/RL-96-25, Revision 0, July 3, 1996.
- *Process for Establishing a Set of Radiological, Nuclear, and Process Safety Standards and Requirements for TWRS Privatization*, DOE/RL-96-0004, Revision 0, February 1996.
- *Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for TWRS Privatization Contractors*, DOE/RL-96-0006, Revision 0, February 1996.

Reviewer orientation will consist of a team review of the regulatory concepts and principles, as described in the required reading documents. The orientation session is scheduled for September 24 - 25, 1997. Reviewers should attend all sessions of the orientation program. During the orientation, the Team will make final preparations for the review of the BNFL submittal, which will commence Friday, September 26, 1997.

Orientation will begin at 8:00 a.m. Wednesday, September 24 and conclude at 4:00 p.m. Thursday, September 25, 1997. Those Team members who are unable to attend the orientation must study this **Handbook** and the review guidance documents, and contact the RTL or ATL with questions prior to their arrival on Friday, September 26, 1997.

5.2 Orientation Schedule and Agenda

The following is the Reviewer Orientation Schedule and Agenda.

Reviewer Preparation and Orientation

September 24, 1997

- 8: 00 Welcome & Team Introductions (R. Barr)
- 8:15 Opening Remarks (Dr. D. C. Gibbs)
- 8:30 TWRS Privatization Historical Perspective (Dr. C. Bell)
- 9:30 Integrated Safety Management (Dr. C. Bell)
- 10:30 Work Smart - DOE's Predecessor Approach (Mr. W. Mullins)
- 11:30 Break for Lunch

- 12:30 DOE's Policy, MOA, and Regulatory Concepts (Mr. R. Barr)
- 1:30 Top-Level Standards and Principles (Mr. R. Barr)
- 2:30 Regulatory Process (Mr. C. Vanderneit)
- 3:30 Standards Process (Dr. J. Boudreau)
- 4:30 Adjourn

September 25, 1997

- 8:00 SRD Review Guidance (Mr. C. Vanderneit)
- 9:00 ISMP Review Guidance (Dr. J. Boudreau)
- 10:00 NRC's Role (Dr. M. Tokar)
- 11:00 Review Team Organization (Mr. R. Barr)
- 12:00 Break for Lunch
- 1:00 Review Team Schedule and Logistics (Mr. C. Vanderneit)
- 2:00 Questions, Answers, Team Interactions, and Subgroup Planning (Mr. R. Barr)
- 3:00 Reviewer Self-Study Time
- 4:00 Adjourn

6. Logistics

This section addresses actions to prepare for and to conduct the review. Each subsection relates to a specified time frame of the review: “Before Notice of Intent to Submit,” “Between Notice and Receipt of Submittal,” “Between Receipt of Submittal and Completion of the Acceptance Review,” “Between Completion of the Acceptance Review and Completion of the Evaluation Report,” and “Closure.” Checklists are provided to assist the RTL in tracking Review Team actions. Spaces for dates and assignments are provided.

6.1 Activities to be Completed Before Notice of Intent to Submit

Task	Assigned to	Date Required	Date Completed
Develop a list of potential reviewers.	Barr		<i>Complete</i>
Select Reviewers.	Barr		<i>Complete</i>
Complete all reviewer documentation required by other sections of this notebook (credentials, nondisclosure, disclosure, etc.) for each reviewer.	Kraemer	9/8/97	
Complete Specific Review Guidance.	Barr		<i>Complete</i>
Issue Review Guidance to the Contractors.	Gibbs		<i>Complete</i>
Determine reviewers' participation schedule.	Barr		<i>Complete</i>
Identify location of reviews. Obtain space.	Spargur	9/8/97	
Determine if some reviewers can perform from a remote location.	Barr	9/15/97	
Locate “tools” for review (computers, copiers, shredder, paper, flip chart(s) with plenty of paper, white boards, tape, markers, erasers, staplers, pencils, comment forms, etc.)	Spargur	9/8/97	
Identify alternatives for copying the submittal rapidly. (Engineering drawings of various sizes may be included in the submittal.)	Spargur	9/8/97	
Prepare all “form letters” <ul style="list-style-type: none"> • Acknowledgment of Receipt of Intent to Submit • Acknowledgment of Receipt of Submittal 	Spargur, Solis	9/8/97	

Task	Assigned to	Date Required	Date Completed
<ul style="list-style-type: none"> Review Extension - Letter to contractor extending period of review in accordance with DOE-RL-0003, last Paragraph of 3.3.1 Technical Inquiry - Basic outline letter to the Contractor to request additional information, clarification, etc. SER Transmittal Letter - describing the outcome of the Review. 			
Identify possible reference material sources (technical, process, standards, etc.).	Vanderneit	9/15/97	
Provide lodging information.	Spargur	8/25/97	
Resolve any RU subcontract issues.	Barr	8/25/97	
Identify badging needs and make appropriate arrangements.	Spargur	9/15/97	
Identify and prepare reviewer preparation and orientation needs.	Barr	9/15/97	

6.2 Activities to be Completed Between Notice of Intent to Submit and Receipt of Standards Approval Submittal

Task	Assigned to	Date Required	Date Completed
Complete any open items from pre-notice of Intent to Submit checklist.	Barr		
Send letter to BNFL acknowledging receipt of Intent to Submit.	Barr		
Notify reviewers of date of reviewer orientation session, review activities, etc. Include schedule. Inform reviewers to bring or ship any reference materials they may need during the review.	Barr		
Confirm working space for reviewers.	Spargur		
Confirm daily Review Team meeting location.	Spargur		

Task	Assigned to	Date Required	Date Completed
Confirm phone installation.	Spargur		
Arrange space for Review Team orientation.	Spargur		
Reviewer Orientation.	Barr		
Ensure completion of Forms 1 and 2 from this Handbook for all reviewers.	Barr		
Release letter from Regulatory Official designating R. Barr as Review Team Leader (RTL).	Gibbs		

6.3 Activities to be Completed Between Receipt of Submittal and Completion of the Acceptance Review

Task	Assigned to	Date Required	Date Completed
Complete any open items from previous checklist.	Barr		
Send letter to BNFL acknowledging receipt of submittal	Vanderneit		
Perform Acceptability Review.	Barr		
Send letter to BNFL with results of Acceptability Review.	Vanderneit		
Determine whether an extension of review period should be extended in accordance with DOE-RL-0003, Section 3.3.1, last paragraph.	Gibbs		

6.4 Activities Between Completion of the Acceptance Review and Completion of the Safety Evaluation Report

Task	Assigned to	Date Required	Date Completed
Provide the Review Team initial list of questions/clarification requests to BNFL with a copy to NRC.	Barr		
Send Notification of Closed Meeting between NRC, RU, and BNFL to discuss submittal.	Vanderniet		
Send announcement for public comment period on the BNFL submittal.	Vanderniet		
Evaluate NRC questions/clarification requests.	Barr		
NRC/Team meeting at RL to discuss NRC's list of initial questions/clarifications and determine which comments will be forwarded to BNFL. (Notice: Meeting may be closed due to competition sensitivity).	Barr		
Additional questions/requests for clarification from RU/NRC meeting sent to BNFL	Barr		
Attend noticed closed meeting, hosted by BNFL. NRC invited to meeting. Meeting may be closed due to competition sensitivity. Purpose of meeting is to allow BNFL to respond to RU questions on submittal.	RU/Barr		
Issue draft SERs for public comment (including Hanford Advisory Board and interested Indian tribes). Courtesy copies sent directly to BNFL and NRC. Note: Coordinate issuance with submission of BNFL Standards Approval submittal to permit public disclosure of BNFL submittal.	Gibbs		
Team revises SER to reflect resolution of public comments.	Barr		
Review Team finalizes SERs and letter of transmittal for signature by Regulatory Official.	Barr		
RU sends Letter of Transmittal and SERs to BNFL with copies to the public and a courtesy copy to NRC.	Gibbs		

6.5 Closure Activities

Task	Assigned to	Date Required	Date Completed
File or destroy materials generated during the review, as appropriate. Refer to Management Directive 2.1, "Information Management" for requirements on "Record Material."	Kraemer		
Send letters to reviewers' supervisors acknowledging individual participation by each reviewer.	Barr, Gibbs		
Conduct lessons-learned session with review team. Team members who cannot participate in person, or by phone, should provide a short memo to the RU with their assessment of lessons learned.	Barr, Vanderneit		

7. Instructions to Reviewers

7.1 Review Guidance

The principal references for use by the Team are listed below. As noted, the Contract is the sole source of all review requirements. Every attempt was made to make the review guidance consistent with the Contract. Nonetheless, if a conflict exists between the Contract and the review guidance, the Contract provisions are to be followed.

- *Guidance for the Review of TWRS Privatization Contractor Integrated Safety Management Plan Submittal Package, RL/REG-97-07, Revision 0, June 25, 1997*
- *Guidance for the Review of TWRS Privatization Contractor Safety Requirements Document Submittal Package, RL/REG-97-08, Revision 0, June 26, 1997*
- *Guidance for the Review of TWRS Privatization Contractor Initial Quality Assurance Program,, RL/REG-96-01, Revision 0, October 1996*
- *Guidance for the Review of TWRS Privatization Employee Concerns management System, RL/REG-96-03, Revision 0, October 1996*
- *Guidance for the Review of TWRS Privatization Contractor Radiation Exposure Standard for Workers, RL/REG-97-09, July 31, 1997.*

The Team may also refer to the four “**governing documents**” cited as references in the review guidance documents (RL/REG-97-07 and RL/REG-97-08) for clarification. These **governing documents** are also referenced in the Contract.

7.2 Team Organization

The Team will be organized into two matrixed divisions of responsibility: One is based on technical discipline; the other based on functional areas of the review.

Attachment A provides the Team organization based on technical discipline. Attachment B provides the Team organization based on functional areas of review responsibility. Figures 1 and 2 provide a flowchart showing the linkage between the functional areas of review responsibility. The divisions outlined in Attachments A and B are arbitrary to a degree; each team member should communicate and interact freely with other team members to accomplish the team charter. The daily team meetings will provide one mechanism to facilitate this communication

The technical discipline subgroup leaders are responsible for coordinating the technical concerns in that discipline and communicating them at the daily team meetings. Likewise, the functional subgroup representatives are responsible for coordinating the conduct and documentation of their subgroup’s portion of the review. Each team member with these responsibilities is also expected to personally participate extensively in the technical review of the submittal.

7.3 Comment/Input Style Guide

Each reviewer should structure their review in terms of questions, observations, and findings. Each of these terms is explained further below.

7.3.1 Question

A Team preliminary concern (documented on Form 3) must be resolved by the Contractor’s clarification of the submittal to meet the approval criteria of the *Regulatory Process* or the *Standards Identification Process*, which are contractual requirements. Any Team member may pose questions based on review of the submittal. The Team will respect the expertise of each team member, and will approve proposed questions, unless a clear basis for not doing so is provided by the Team or RTL in the daily team meeting, or on the Form 3, or both.

7.3.2 Observation

A Team safety judgment or inference based on the reviewer’s experience and expertise that is not related directly to a citation from the Contract or the references cited as part of Contract requirements.

7.3.3 Finding

A review result that is related directly to a citation from the Contract or the references cited as part of Contract requirements. (Findings may be positive or negative.)

7.4 Documenting Preliminary Questions Concerning Privatization Contractor Submittal

As the review progresses, reviewers and review subgroups will develop questions concerning the **Privatization Contractor's** submittal. If a reviewer considers a question significant enough to require a **Privatization Contractor's** response to evaluate the acceptability of the submittal, the question shall be promptly documented (using Form 3) and discussed with the Team at the daily team meeting. If the question is considered valid by the Team, the RTL or ATL will forward these questions to the **Privatization Contractor** within one working day. The Team will respect the expertise of each team member in making these endorsements.

The **Privatization Contractor** may choose to respond to these informal questions, or may choose to wait for a follow-up letter from the RO requesting a formal response. (The RTL will aggregate all questions to the **Privatization Contractor** at several intervals during the review period.) Where the **Privatization Contractor's** preliminary response to a question is already known, based on discussions with the **Privatization Contractor**, that response will be referenced in the subsequent formal letter.

The formal letter and formal **Privatization Contractor** responses are the only material, other than the Contract submittal, which may be used by the Team in establishing a basis for the acceptability of the submittal. No reviewer shall rely solely upon verbal assurances by **Privatization Contractor** employees of measures to be taken to ensure acceptability of portions of the **Privatization Contractor's** submittal. Any significant verbal assurances must be confirmed by the **Privatization Contractor** in writing to be used by the Team in the SER.

The RTL will attempt to resolve any technical disputes among the Team members. If this resolution is unsatisfactory to some Team members, the Team members may choose to offer a differing professional opinion or view in accordance with Section 7.5, "Differing Professional Opinion/Differing Profession View (DPO/DPV)." The Team review will continue independently of the resolution of these DPO/DPVs, based on the RTL's resolution of the issue.

7.5 Differing Professional Opinion/Differing Professional View Procedure

RU Management Directive 5.5, "Regulatory Unit Procedure for Handling Differing Professional Views or Opinions," provides a mechanism for the resolution of technical concerns that a Team member considers to have been inadequately resolved by the Team. A differing professional view (DPV) is resolved informally by an ad hoc review panel appointed by the RO. A differing professional opinion (DPO), used when the reviewer is unsatisfied with the results of the DPV process, is resolved formally by a second ad hoc review panel, convened by the RL Director of Environmental Safety and Health. Team members are encouraged to work constructively with the other team members to resolve technical differences of opinion so that all parties are satisfied with the resolution. In the event this is not possible, the DPO/DPV procedure provides the mechanism to ensure technical concerns are fully reviewed by RL with no retaliation or discrimination against the concerned reviewer.

7.6 Comment Tracking System

The Review Team Administrative Assistant and ATL will develop and maintain a method to compile and track questions, observations, and findings from team members.

Figure 1. Flowchart of Functional Areas of Review Responsibility.

Figure 2. Annotated Flowchart of Functional Areas of Review Responsibility.

Form 3 Regulatory Unit Review Team Preliminary Questions for Contractor

8. Documentation

After most questions concerning the submittal have been resolved, the team will draft the Safety Evaluation Report (SER). The SER will be organized to demonstrate that all approval criteria have been evaluated, and to clearly document the rationale for approval or disapproval.

8.1 Draft Safety Evaluation Report Outline

The RTL will prepare a detailed SER outline and assign team members to prepare portions of the SER. Each Team member should document the significant concerns he/she have identified, discuss why there was a concern (including the relation to the approval criteria, where appropriate), and describe the basis by which the concerns have been resolved (or remain unresolved). The description should be clear, technically complete, as concise as practical, and consistent with the topic. **The Privatization Contractor's** submittal and formal correspondence with the **Privatization Contractor** during the review should be extensively referenced, where applicable.

Technical discipline subgroups and functional subgroups should coordinate their individual team member documentation efforts, and cooperate to efficiently divide the documentation effort.

All relevant questions that the Team identifies must be documented. As previously discussed in Section 8, preliminary questions (Form 3) are endorsed by the Team, then provided to the **Privatization Contractor** for a response. Every significant reviewer concern should be converted into a preliminary question (Form 3) unless the reviewer is able to satisfy the concern based upon a review of the submittal or other formal **Privatization Contractor** correspondence to the RU. Verbal responses from **Privatization Contractor** personnel related to reviewer concerns, by themselves, are not sufficient to resolve concerns. The submittal and associated follow-up correspondence must provide an objective basis for the Team to resolve the concern.

8.2 Documentation Format

Individual Team members will provide their documentation in a manner conducive to easy incorporation with other contributors' documentation. Team members shall use Microsoft Word 7.0 (or lower versions) for MS DOS platforms when providing their input electronically. (MacIntosh users should provide their input in Word 6.1.) If MS Word 7.0 (or a lower version) is unavailable, the reviewer will provide input in WordPerfect 6.1 or 5.1. Team members should avoid the use of macros, link text, and other special fields when generating text. Electronic input should be formatted using Times New Roman Font Style and 11 pt Font Size. Individual contributors shall provide a hard copy of their input along with their electronic data. This hard copy should be double-spaced and singled-sided.

Each Team member should prepare his/her documentation consistent with the DOE Style Guide manual. Use of spell checkers, grammar checkers, as well as proof-reading by other team members is highly encouraged to enhance the readability and coherence of the SER.

The Assistant Team Leader (ATL) will amplify the schedule in this instruction to indicate when draft SER inputs will be required, and who will be the lead writer for each input. Due to the potentially short time period of this review, Team members must meet the documentation schedule that is developed and mutually agreed upon. All Team members are encouraged to advise the ATL or RTL of any constraints on their ability to complete their SER inputs in a timely manner, before the final schedule is developed.

9. Lessons Learned

At the conclusion of the review, a lessons learned session will be held, with solicitation of input from all who participated in the review. Significant results of the session will be documented and provided to the RO and the Team members.

Attachment A
Technical Discipline Subgroups

Radiological Safety

*Rey Bocanegra** *Matt Moeller* *Ed Blackwood*

Hazards Analysis

*Dr. Jay Boudreau** *Dr. Roy Hardwick* *Mary Haughey* *Dr. John Hockert*

Chemical Engineering

Mike Elliott *Joseph Perez* *Dr. C.K. Liu** *Dr. Roy Hardwick*

Criticality Safety

*Dr. Jerry McKamy** *Dr. Roland Felts*

System Mechanical/Electrical/I&C Design (non-structural)

Mike Elliott *Dr. Pranab Guha* *Dr. Jeff Martin** *Mary Haughey*

Fire Protection

*Dennis Kubicki**

Quality Assurance

Thomas Colandrea *Dr. Jeff Martin* *Clark Vanderneit** *Mary Haughey*

Vitrification

*Joseph Perez** *Mike Elliott*

External Events and System Structural Design

*Dr. Sabir Sen** *Dan Guzy**

The technical discipline leader is indicated by an asterisk. Some team members are in more than one discipline subgroup.

Attachment B
Functional Review Area Subgroups
(See also Figures 1 and 2)

Standards Identification Process

*Rey Bocanegra** *Dr. Jay Boudreau* *Tom Hull* *Neal Hunemuller*

Hazards Control Review

*Dr. Jay Boudreau** *Dr. Pranab Guha* *Dr. Roland Felts* *Michael Elliot*
Dennis Kubicki *Dr. Roy Hardwick* *Dr. Jerry McKamy* *Joseph Perez*
Mary Haughey *Dr. Jeff Martin* *Dr. Sabir Sen* *Clark Vanderniet*
Dan Guzy

Conformance/Compliance Review

*Rey Bocanegra** *Matt Moeller* *Ed Blackwood*
Thomas Colandrea *Dr. Jeff Martin*

Quality Assurance

Thomas Colandrea *Clark Vanderniet** *Dr. John Hockert* *Dr. Jeff Martin*

Integrated Safety Management

Dr. John Hockert *Tom Hull* *Mary Haughey* *Neal Hunemuller*
Dr. Jay Boudreau *Mike Elliot* *Dr. Roy Hardwick* *Clark Vanderniet**

Integration

*Robert Barr** *Clark Vanderneit* *Tom Hull*

Note: Some functional review area subgroups overlap with technical subgroups.

The responsible functional subgroup team member leader is indicated by an asterisk. This team member is responsible to the RTL to coordinate the referenced review guidance by his subgroup.