

Information Bulletin

This Bulletin is being provided to you for review, analysis, and internalization as applicable.

Title: Release of Controlled-Use Documents Without Release Evaluations

Date: November 16, 2006

Identifier: 2006-RL-HNF-0049

Lessons Learned Summary: Documents, regardless of affiliation or document form (for example - document, email, internet), must be created and managed in a manner that ensures that they are properly prepared; adequately reviewed and approved; distributed to, and properly used by those responsible for performing the task, activity, or function described within the document; and revised or changed in a manner that ensures that configuration is maintained and adequately documented. All information to be released to a third party must undergo a formal release review. A third party is anyone outside the company you work for, to include but not limited to other contractors and government agencies (DOE-RL included).

Discussion of Activities: Throughout the history of the Hanford transuranic (TRU) Program (starting in the year 1999), several technical documents known as *Acceptable Knowledge* (AK) documents were created and transmitted to DOE-CBFO (Carlsbad) without being created, revised or released through the Hanford document processes. A recent review of these documents revealed a few of them contained *controlled use information* that was not properly marked and controlled.

AK documents are prepared to document the history associated with the generation of various TRU waste families or what are known as *waste streams* [e.g., Plutonium Finishing Plant (PFP) debris waste]. The preparation of AK documents requires collecting information from multiple source documents (e.g., waste packaging procedures) to create the document for a particular waste stream. These source documents are referenced within the AK document.

AK documents are required by the Waste Isolation Pilot Plant (WIPP) RCRA Permit and must be approved by DOE-CBFO. The WIPP Permit contains specific requirements for the contents of the AK documents. The documents are routinely updated to reflect the collection of waste characterization information as the wastes are processed for eventual disposal at WIPP.

In response to the recent implementation of the DOE Order for *Official Use Only* (OUO) information, the Hanford TRU Program performed a comprehensive review of program documentation. This review resulted in the marking of some AK documents as "OUO". Before transmitting AK documents, now marked as OUO, to CBFO, the program submitted the documents for a formal classification and release review within the Hanford system according to the procedure requiring the reviews. It was during this review that some AK documents were discovered to contain controlled-use information. Some previously unmarked versions of these AK documents containing this controlled-use information had been sent to CBFO and were placed in their records system.

Analysis: Investigation revealed program personnel did not fully understand and comprehend that the collection of information from assorted uncontrolled source documents (example - documents not marked as controlled-use information) could result in the creation of a controlled-use AK document. Had these AK documents been properly submitted for release evaluations in accordance with established site procedures, the controlled nature of the information would have been identified, allowing proper management of the documents by both the TRU Program and the CBFO.

Personnel also made an incorrect assumption that because documents were being transmitted to a 'DOE entity' (i.e. CBFO) a formal release evaluation was not required. Had these AK documents been properly submitted for release evaluations in accordance with established site procedures, the controlled nature of the information would have been identified, allowing proper management of the documents by both the TRU Program and the CBFO.

Recommendations:

- Projects and facilities should conduct a management assessment on their information control (preparation, distribution, revision etc.) and release processes to ensure compliance with the applicable procedures and requirements. In the process, they should identify all procedures that are required for their organization to perform their work.
- Personnel creating any form of information for release to a third party should be informed by their manager (i.e. required reading) of the proper methods for releasing such information. A third party is anyone outside the company you work for, to include but not limited to other contractors and government agencies (DOE-RL included).

Cost Savings/Avoidance: Not Evaluated

Work Function: Conduct of Ops – Procedure Adherence

Hazards: None

Keywords: OUO, Information Release, Controlled-Use Information, Document Control

Originator: Fluor Hanford, Inc., Submitted by Richard Dunn

Contact: Project Hanford Lessons Learned Coordinator; (509) 372-2166; e-mail: PHMC_Lessons_Learned@rl.gov

References: None

Distribution: General