

Information Bulletin

Clarity in Technical Documents is Critical

September 17, 2007

2007-RL-HNF-0036

Tracking No: 655

Summary: Technical documents, such as administrative controls within a facility authorization basis, present special challenges because of the highly technical information they often contain. At the same time; multiple audiences, some highly knowledgeable, some less so must use these documents to ensure facility safety. Often even technical experts do not always understand technical language easily or quickly. Therefore it is critical to ensure a document's language is clear and precise so all users can focus on and understand the technical content of the document.

Discussion of Activities: During the revision of a nuclear facility Technical Safety Requirement (TSR) for minimum staffing, a question was raised on whether a single Shift Operations Manager (SOM) could manage two co-located facilities simultaneously and still meet the TSR minimum staffing requirements. This question arose due to the existing wording in the TSR definitions and the wording which describes the derivation of a specific TSR administrative control. The facility understood the TSR as allowing one SOM to fulfill the minimum staffing requirement for two facilities when each was considered to be manned. The Department of Energy Richland Operations Office issued a letter stating this minimum staffing interpretation was a violation of the TSR Administrative Control (AC).

Analysis: Interpretation of what was required by the Final Safety Analysis Report and TSR by DOE reviewers was different than the understanding applied by project management. This difference created a situation where the facility was said to have been out of compliance with its authorization basis. This was caused by the terminology and syntax variances used in the safety documents.

Recommended Actions: Terminology being used throughout any document and the intent of the document must be clear. The wording, style, syntax, and tone must ensure its content cannot be considered ambiguous. Facility technical documents, procedures, or any written communication need to be standalone whenever possible. In cases where they cannot, an independent review needs to be performed to ensure clarity of the content so their meaning cannot be misinterpreted.

Cost Savings/Avoidance: Not Evaluated

Work Function: Management

Hazards:

ISM Core Functions: Perform Work

Keywords: Authorization Basis; Procedure

Originator: Fluor Hanford, Inc., Submitted by Nathan Cathey

Contact: PHMC Lessons Learned; (509) 372-2166; e-mail: [PHMC Lessons Learned@rl.gov](mailto:PHMC_Lessons_Learned@rl.gov)

References: FH-0700497, dated February 27, 2007, *Submittal of Clarification to the K Basins Closure Project Technical Safety Requirements*; EM-RL--PHMC-SNF-2007-0006, *Minimum Staffing Requirements - TSR Administrative Control Violation*