SAFETY EVALUATION WORKSHEET

Safety Evaluation Number: SE-W375-99-00003 Revision No: 0

Safety Evaluation Title: Revision to SRD Implementing Standard for Configuration Management

PART I: DESCRIPTION OF THE PROPOSED CHANGE, BACKGROUND, AND SCHEDULE

1. Describe the aspects of the issue being evaluated and its expected effects.

   The issue is the modification of Safety Criteria 4.0-1, 4.0-2, and 4.0-3 to identify ISO 10007 as the Implementing Standard for Configuration Management. The identification of ISO 10007 replaces ISMP Sections currently referenced in the SRD as Implementing Standards for Configuration Management and corrects a condition identified in RL/REG-98-09 relative to adequacy of the ISMP Sections as Implementing Standards.

2. Identify the parameters, programs, procedures and systems affected by the issue.

   This change affects those portions of the SRD identified above. Changes to the ISMP and other Authorization Basis Documents, if required, resulting from approval of the Implementing Standard will be addressed through separate ABCNs. The current draft Configuration Management Plan is consistent with ISO 10007. Procedures and Codes of Practice will be reviewed and revised if necessary to ensure consistency with the Configuration Management Plan and ISO 10007.

3. Identify the credible failure modes associated with the proposed issue.

   This change addresses the identification of Implementing Standards for Safety Criteria related to Configuration Management. Failure modes are not affected by this change.

4. List the references to location of information used for the safety evaluation.

   - BNFL-5193-SRD-01, *TWRS-P Project Safety Requirements Document, Volume II, Revision 2, Safety Criteria 4.0-1, 4.0-2, and 4.0-3.*
   - DOE/RL-96-00004, *Process for Establishing a Set of Radiological, Nuclear, and Process Safety Standards, and Requirements for TWRS Privatization*
   - SIN-W375-99-00023, *Selection of Standards for Configuration Management.*
   - ISO 10007 *Quality Management – Guidelines for configuration management*

ISSUED BY
TWRS-P PDC
HAF 5-18-99
INIT DATE

5. Describe the planned implementation schedule.

The Safety Criteria and revised Implementing Standard are to be submitted to the RU to provide for RU review and acceptance. The Safety Criteria and Implementing Standard are applicable throughout the TWRS-P Facility design, construction, operation and deactivation. The Configuration Management Program will be implemented in accordance with the Configuration Management Plan.

PART II: POTENTIAL IMPACT ON QUALITY ASSURANCE; RADIATION PROTECTION; SAFETY REQUIREMENTS DOCUMENT; TECHNICAL SAFETY REQUIREMENTS; REGULATORY COMMITMENTS; PROGRAM AND PROCEDURE EFFECTIVENESS; AND DESIGN BASIS

1. Does the proposed change affect the TWRS-P Quality Assurance Program?

   NO, this proposed change is specific to SRD Safety Criteria in the area of Configuration Management and does not directly impact the TWRS-P QA Program. The QA program requires Configuration Management, adoption and implementation of ISO 10007 will ensure an adequate Configuration Management Program is in place consistent with the QAP.

2. Does the proposed change affect the TWRS-P Radiation Protection Program?

   NO, this proposed change is specific to SRD Safety Criteria in the area of Configuration Management and does not directly impact the Radiation Protection Program.

3. Does the proposed change involve the deletion or modification of a standard previously identified or established in the approved SRD?

   YES. RL/REG-98-01 accepted Safety Criteria 4.0-2 as the subordinate standard for Configuration Management (SC 4.0-1, and 4.0-3); however, RL/REG-98-09 raised a discrepancy against the adequacy of citing the Integrated Safety Management Plan as Implementing Standards.

4. Does the proposed change involve the modification of an approved Technical Safety Requirement?

   NO, TSRs are not yet established for the facility.

5. Does the proposed change result in a reduction in commitment currently described in the Authorization Basis?

   NO, the proposed change in Safety Criteria Implementing Standards corrects a deficiency in this area as noted in RL/REG-98-09.

6. Does the proposed change result in a reduction in the effectiveness of any program, procedure, or plan described in the Authorization Basis?

   NO, the proposed change does not reduce the effectiveness of any program, procedure, or plan described in the Authorization Basis. This is because the revised Implementing Standard describes an appropriate and adequate methodology of implementing the Safety Criteria (SC 4.0-1, 4.0-2, and 4.0-3).

Adoption of the revised Implementing Standard corrects a deficiency noted in RL/REG-98-09. Once implemented, the Safety Criteria and revised Implementing Standard will achieve compliance with the top-level radiological, nuclear, and process safety standards and principles stated in DOE/RL-96-0006.

7. Does the proposed change result in an Unreviewed Safety Question?

N/A. This question applies after issuance of the Production Operations Authorization.

PART III: IMPACT ON THE ACCIDENTS EVALUATED AS THE DESIGN BASIS

N/A. This section applies after issuance of the Production Operations Authorization.

PART IV: POTENTIAL FOR CREATION OF A DIFFERENT TYPE OF UNANALYZED EVENT

N/A. This section applies after issuance of the Production Operations Authorization.

PART V: IMPACT ON THE MARGIN OF SAFETY

N/A. This section applies after issuance of the Production Operations Authorization.

Part VI: SAFETY EVALUATION CONCLUSION

Based on the evaluation in Part II, and as applicable, Parts III, IV, and V, the proposed change:

Quality Assurance Program

_✓_ Does not involve a change of the Quality Assurance Program and Implementation Plan

____ Does involve a change of the Quality Assurance Program and Implementation Plan and requires an evaluation in accordance with Appendix 3 of this Code of Practice.

Radiation Protection Program

_✓_ Does not involve a change of the Radiation Protection Program.

____ Does involve a change of the Radiation Protection Program and requires an evaluation in accordance with Appendix 4 of this Code of Practice.

Safety Requirements Document

____ Does not involve the deletion or modification of a standard previously identified or established in the approved SRD.

_✓_ Does involve the deletion or modification of a standard previously identified or established in the approved SRD and requires the preparation and attachment of an Authorization Basis Amendment Request to this form.

Technical Safety Requirements

_✓_ Does not involve the modification of an approved Technical Safety Requirement.

____ Does involve the modification of an approved Technical Safety Requirement and requires the preparation and attachment of an Authorization Basis Amendment Request to this form.

Regulatory Commitments

_✓_ Does not result in a reduction in commitment described in the Authorization Basis.

____ Does result in the reduction in commitment described in the Authorization Basis and requires the preparation and attachment of an Authorization Basis Amendment Request to this form.

Program, Plan, and Procedure Effectiveness

_✓_ Does not result in a reduction in the effectiveness of any program, procedure, or plan described in the Authorization Basis.

____ Does result in a reduction in the effectiveness of a program, procedure, or plan described in the Authorization Basis and requires the preparation and attachment of an Authorization Basis Amendment Request to this evaluation form.

Unreviewed Safety Question

_✓_ Does not constitute an Unreviewed Safety Question.

____ Does constitute an Unreviewed Safety Question and requires the preparation and attachment of an Authorization Basis Amendment Request to this evaluation form.

Evaluator/Originator	04/06/99 Date
Reviewer	8 APRIL 99 Date
Owner, Structure, System, Component, Program, Plan, or Procedure	4/6/99. Date
Manager, Engineering or Operations	4/23/99 Date
Manager, Safety and Regulatory Programs	4/23/99 Date
Manager, Quality Assurance	11 May 1999 Date
Chairman, Project Safety Committee	13 May 99 Date
TWRS-P Project Manager	5/13/99 Date