



Department of Energy
Germantown, MD 20874-1290

December 28, 1995

Mr. Lester Ettliger
Defense Nuclear Facility Safety Board
625 Indiana Ave., N.W.
Suite 700
Washington, DC 20004

Dear Mr. Ettliger:

In accordance with the Department's commitment to the Board, enclosed are the Traceability Reports for the following new EH Directives:

1. Order 210.1 Performance Indicators and Analysis of Operations Information
2. Order 225.1 Accident Investigation
3. Order 231.1 Safety and Health Reporting Requirements
4. Order 232.1 Occurrence Reporting and Processing of Operations Information
5. Order 420.1 Facility Safety
6. Order 440.1 Worker Protection
7. Order 440.2 Aviation
8. Order 451.1 National Environmental Policy Act Compliance Program
9. Order 460.1 Packaging and Transportation Safety

Also included are instructions on how to read the Traceability Reports and graphic summaries relating to (1) the Genesis of New DOE-EH Requirements Documents, and (2) the Disposition of Old DOE-EH Orders. These Traceability Reports and the previously furnished narrative crosswalk for DOE Order 420.1 complete the mapping of the revised EH Orders.

We will provide the mapping of the new Part 830 rules prior to the issuance of those rules, presently scheduled for March 1996. If you have any questions, you can contact me at (301) 903-3465.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Black".

Richard L. Black, Director
Office of Nuclear Safety
Policy and Standards

Enclosures



cc: w/o enclosures
R. Nordhaus, GC-1
O. Pearson, EH-3
M. Morris, HR-6
R. Diaz, GC-75

READING TRACEABILITY REPORTS

Traceability reports have been developed that provide the link between requirements in existing EH Orders (Phase II) and EH documents in the new directives system (Orders, Contractor Requirements Documents, Manuals [Phase III]). Traceability reports take the following two forms:

PHASE II TO PHASE III:

Each Phase II document was binned by the Order writer or subject matter expert to identify mandatory statements (requirements). Each requirement was assigned an electronic tracking identifier (TKID) that contains the name of the document, the string "requ" (indicating a requirement as distinguished from "policy" or "guidance" statements), a unique identification number, and is tied to a reference to the section of the document in which the statement is found. The section reference generally consists of the section number as found in the document (e.g., "8.a"), although there are cases in which a single section contains multiple requirement statements. In such cases, the initial word is included to indicate to the reader the precise starting point of the requirement (e.g., "8.aWhen" or "8.aIn").

A Phase II to Phase III report consists of the disposition of each requirement reviewed by a functional group in its development of Phase III documents. The functional groups, subject areas, and Phase III documents are as follows (no reports were generated for Groups 4, 5D, or 7, as they were disbanded before completion of Phase III):

GROUP 1 Subject Areas: Reporting, Performance Indicators

Phase III Documents: 210.1, "Performance Indicators and Analysis of Operations Information" (Order and CRD)

231.1, "Safety and Health Reporting Requirements" (Order, CRD, Manual)

GROUP 1A Subject Area: Occurrence Reporting

Phase III Documents: 232.1, "Occurrence Reporting and Processing of Operations Information" (Order, CRD, Manual)

GROUP 2 Subject Area: Assessments

Phase III Documents: None (Assessment-related requirements found in 10 CFR 830.120)

GROUP 3 Subject Area: Training

Phase III Documents: None (Training-related requirements found in 10 CFR 830.330 and HR Order)

GROUP 4 Subject Area: Employee Concerns

Phase III Documents: None (Team disbanded with transfer of 5480.29 to HR)

GROUP 5A Subject Area: Nuclear Facility Safety

Phase III Documents: 420.1, "Facility Safety" (Order and CRD)

GROUP 5B Subject Area: Startup and Restart

Phase III Documents: 425.1, "Startup and Restart of Nuclear Facilities" (Order and CRD)

GROUP 5C Subject Area: Maintenance

Phase III Documents: None (Maintenance-related requirements found in 10 CFR 830.340)

GROUP 5D Subject Area: Decontamination/Decommissioning

Phase III Documents: None (Decontamination/Decommissioning-related requirements covered by FM Order)

GROUP 6 Subject Area: Worker Protection

Phase III Documents: 440.1, "Worker Protection" (Order, CRD, Explosives Safety Manual)
441.1, "Occupational Radiation Protection" (Notice) (Requirements also found in 10 CFR 835)

GROUP 7 Subject Area: Public Protection

Phase III Documents: None (Public Protection-related requirements found to be overlapping with Group 8)

GROUP 8 Subject Area: Environmental Protection

Phase III Documents: None (Order 5400.1 remains in effect. Other environment-related requirements found in 10 CFR 834)

GROUP 9 Subject Area: Technical Standards Program

Phase III Documents: None (Order remains in effect)

GROUP 10 Subject Area: Accident Investigation

Phase III Documents: 225.1, "Accident Investigation" (Order and CRD)

GROUP 11 Subject Area: Aviation Safety

Phase III Documents: 440.2, "Aviation" (Order and CRD)

GROUP 12 Subject Area: NEPA

Phase III Documents: 451.1, "National Environmental Policy Act Compliance Program" (Order)

GROUP 13 Subject Area: Packaging and Transportation Safety

Phase III Documents: 460.1, "Packaging and Transportation Safety" (Order and CRD)

The Phase II to Phase III report shows the disposition of each requirement in the following three ways:

- By a specific link to a Phase III document. In this case, the relevant text from the Phase III Order, CRD, Manual, or Notice (identified by O, C, M, or N preceding the document number as given above) appears on the report. A single Phase II requirement may be linked to multiple Phase III statements or documents.
- By a "Reference" to a Phase III supporting document, such as an Implementation Guide or Technical Standard. The Functions and Responsibilities (FAR) Manual is also listed for generic responsibilities that are no longer contained in Orders.
- By a "Comment" that may give more detail or provide an alternative disposition (e.g., by noting that the requirement has been deleted or is now contained in a Rule or other document not related to Phase III).

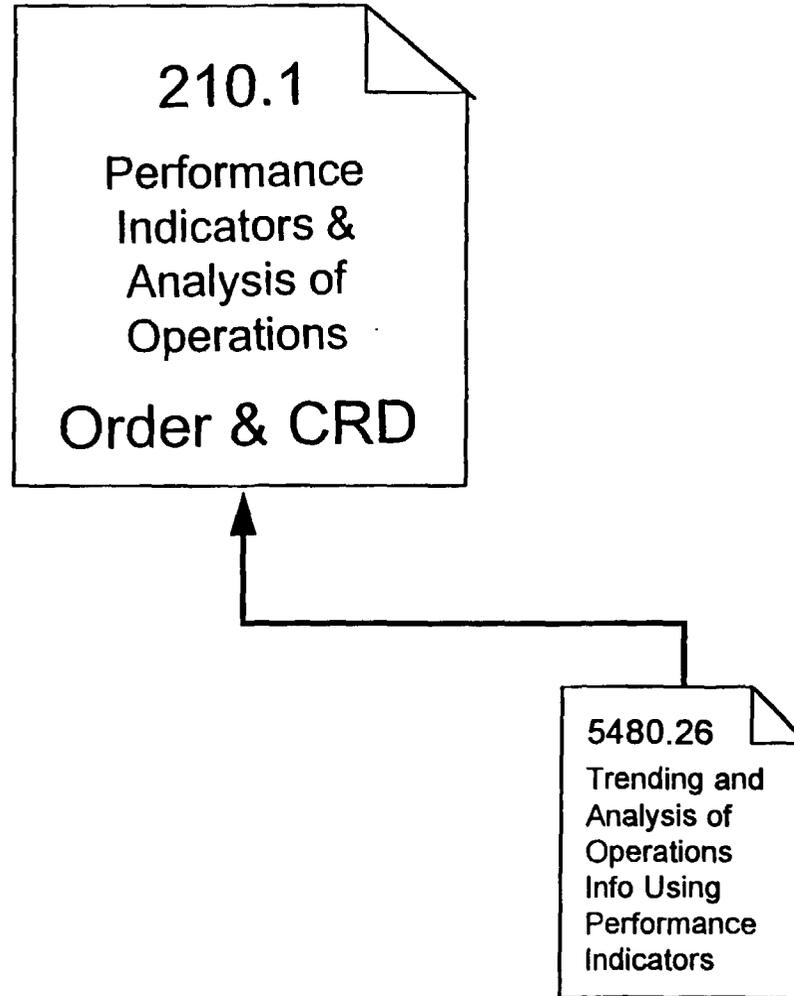
It should be understood that Rules and non-EH Orders are not considered Phase III documents, therefore text from those documents will not appear under the disposition of Phase II requirements.

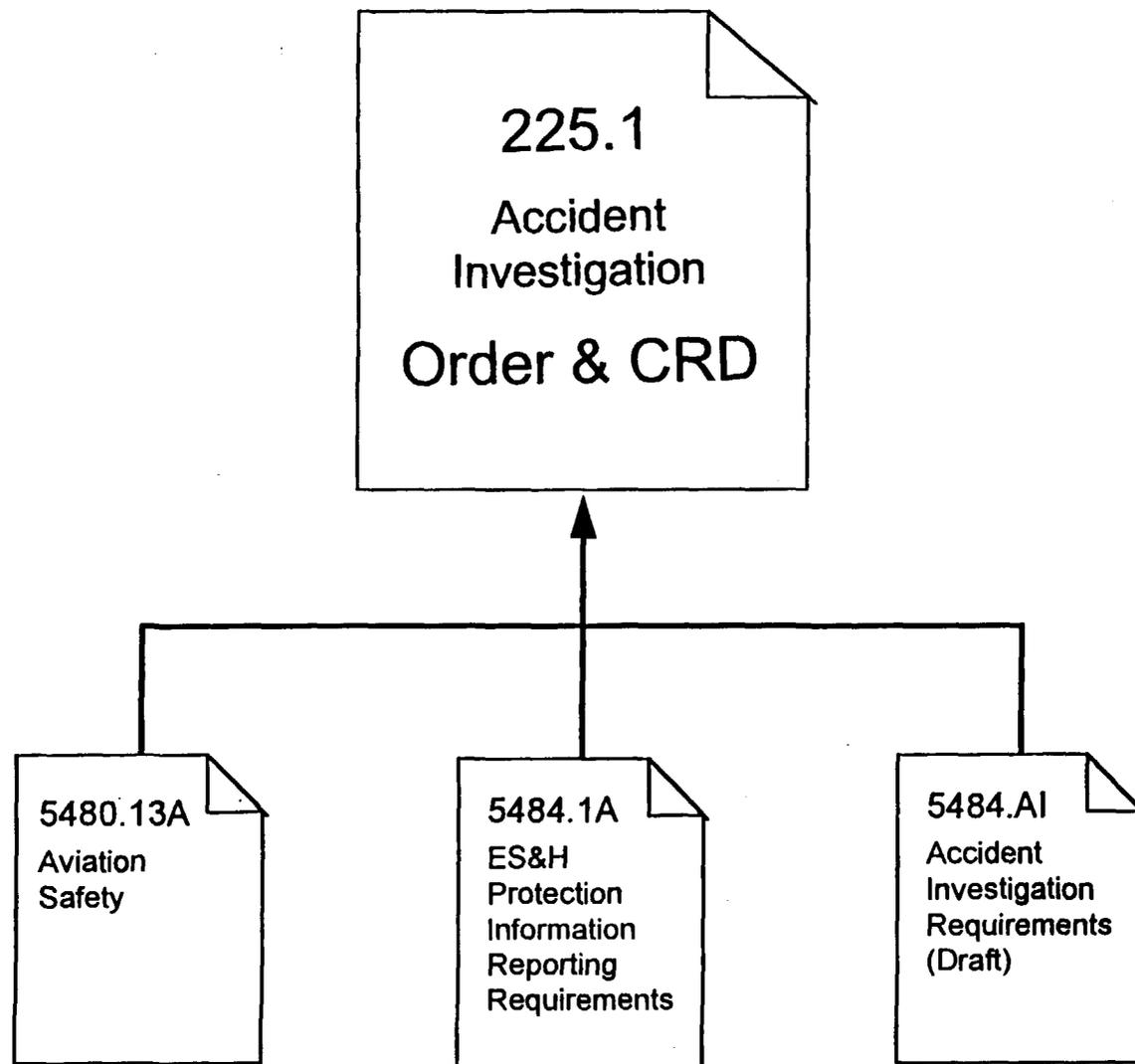
PHASE III TO PHASE II:

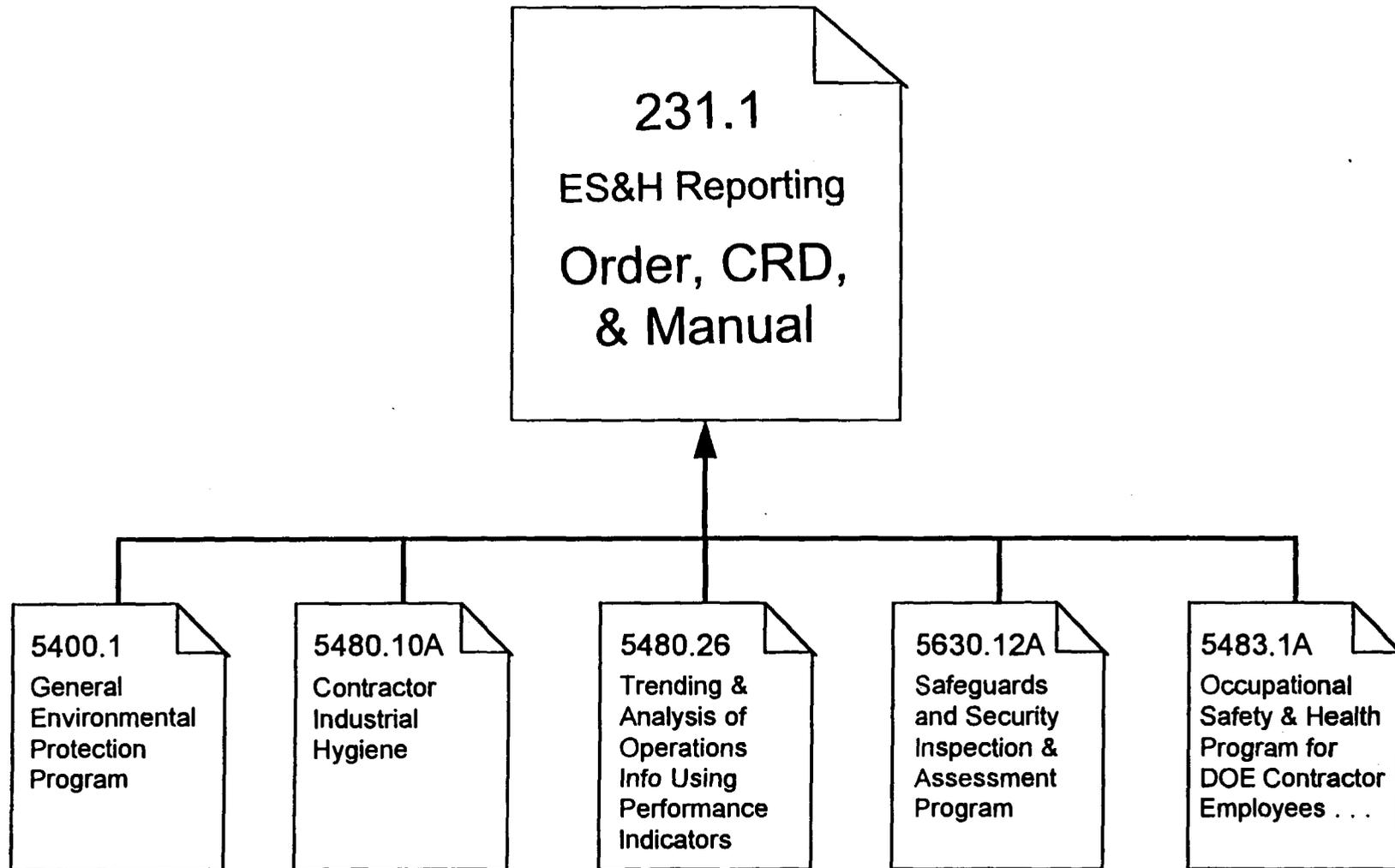
The Phase III to Phase II report traces requirements back from Phase III documents. The text of each "element" of a Phase III document is shown, along with all Phase II requirements (listed by TKID) determined by the Order writers to be "source" requirements for that element. Reports were developed for the 23 Phase III documents listed above (10 Orders, 9 CRDs, 3 Manuals, and 1 Notice). Only those Phase III elements that are linked to Phase II requirements are shown on the report.

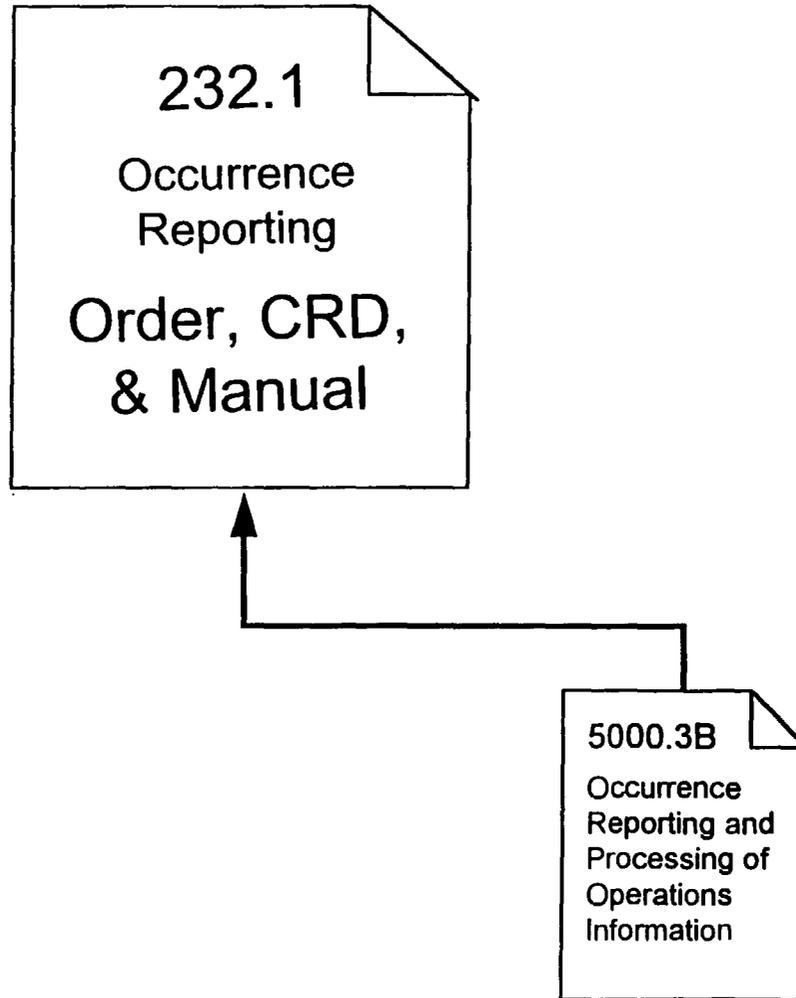
Genesis of New DOE-EH Requirements Documents

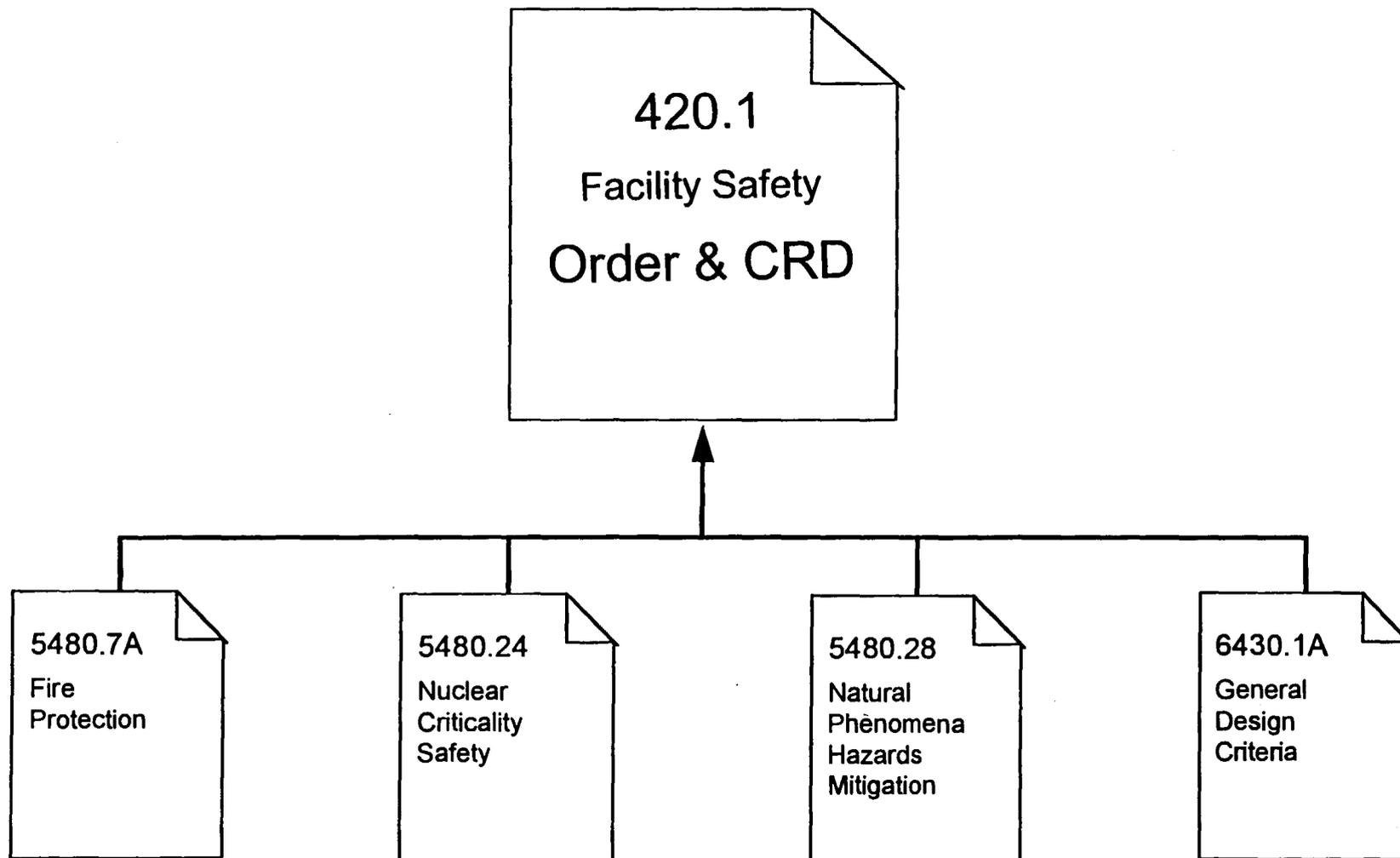
Graphic Summary

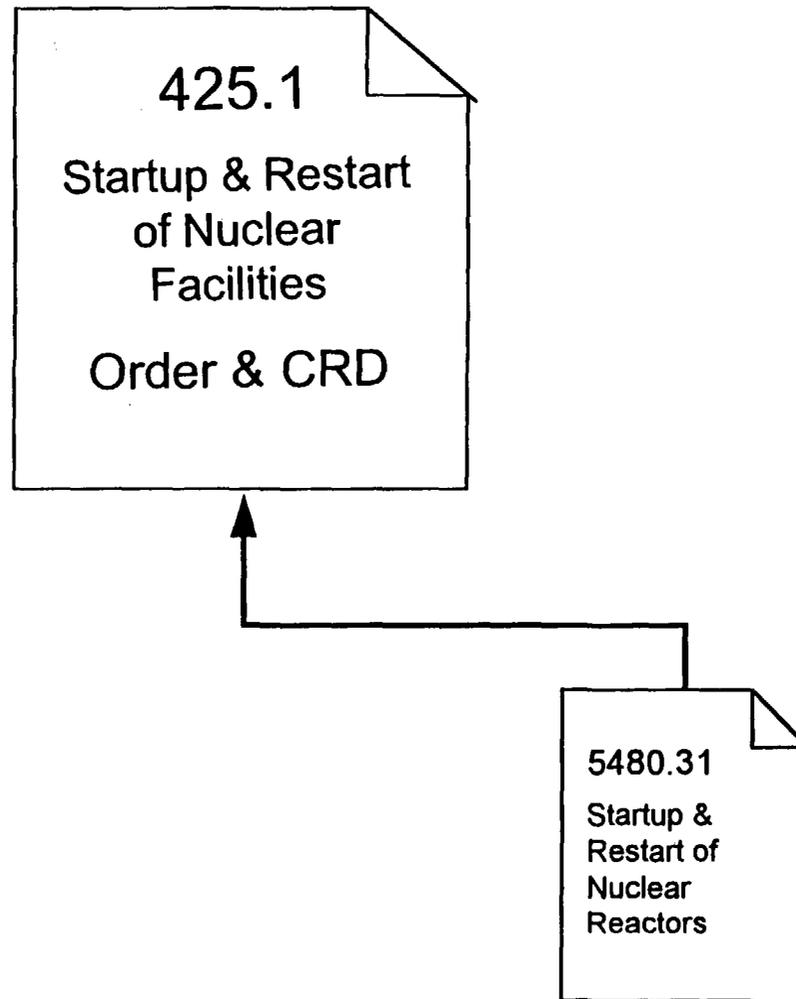


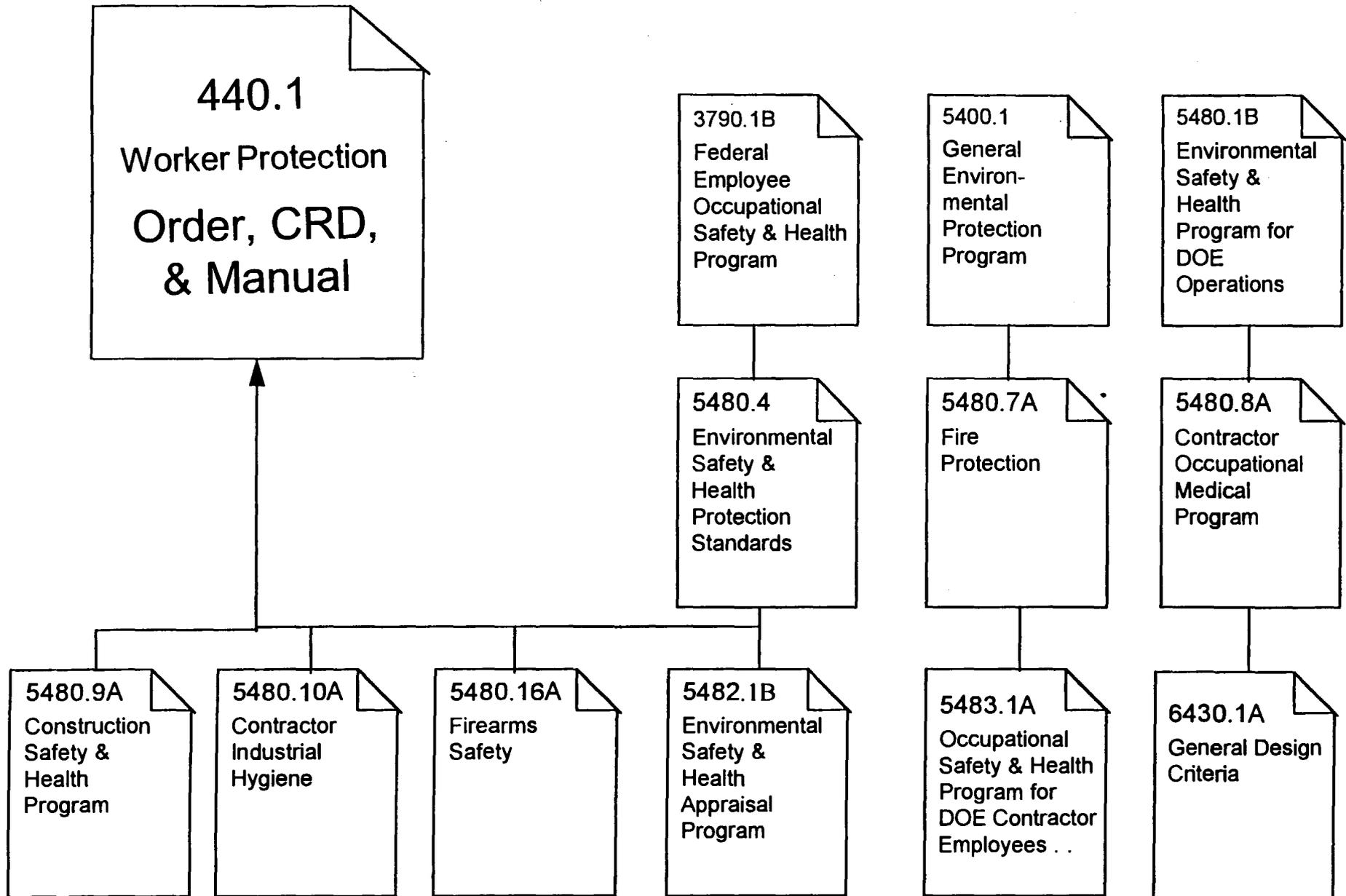


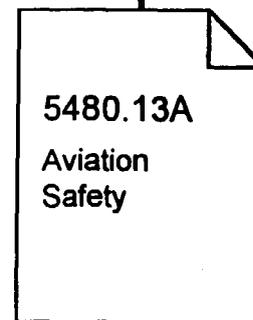
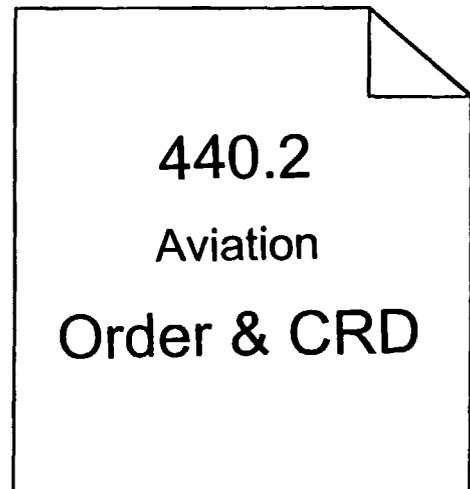


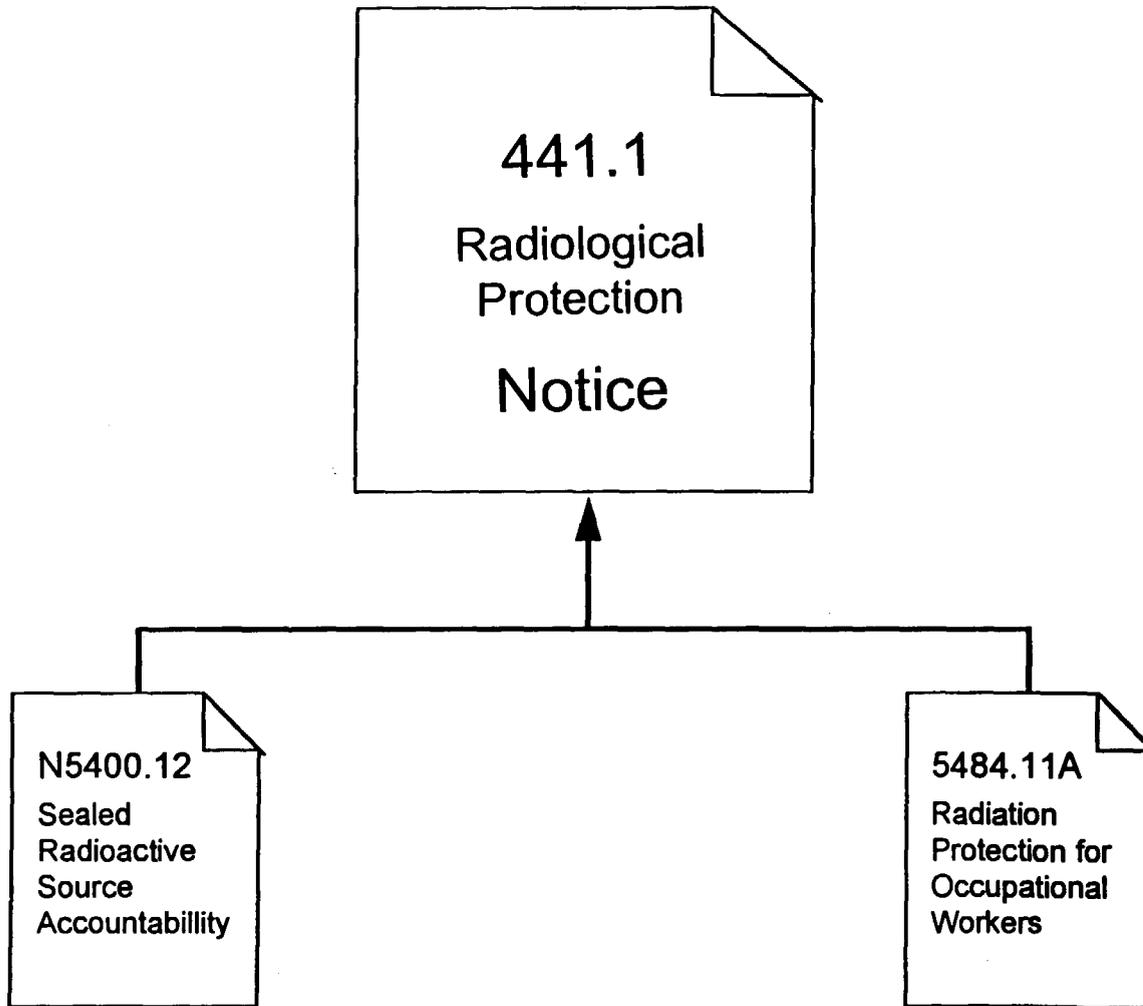


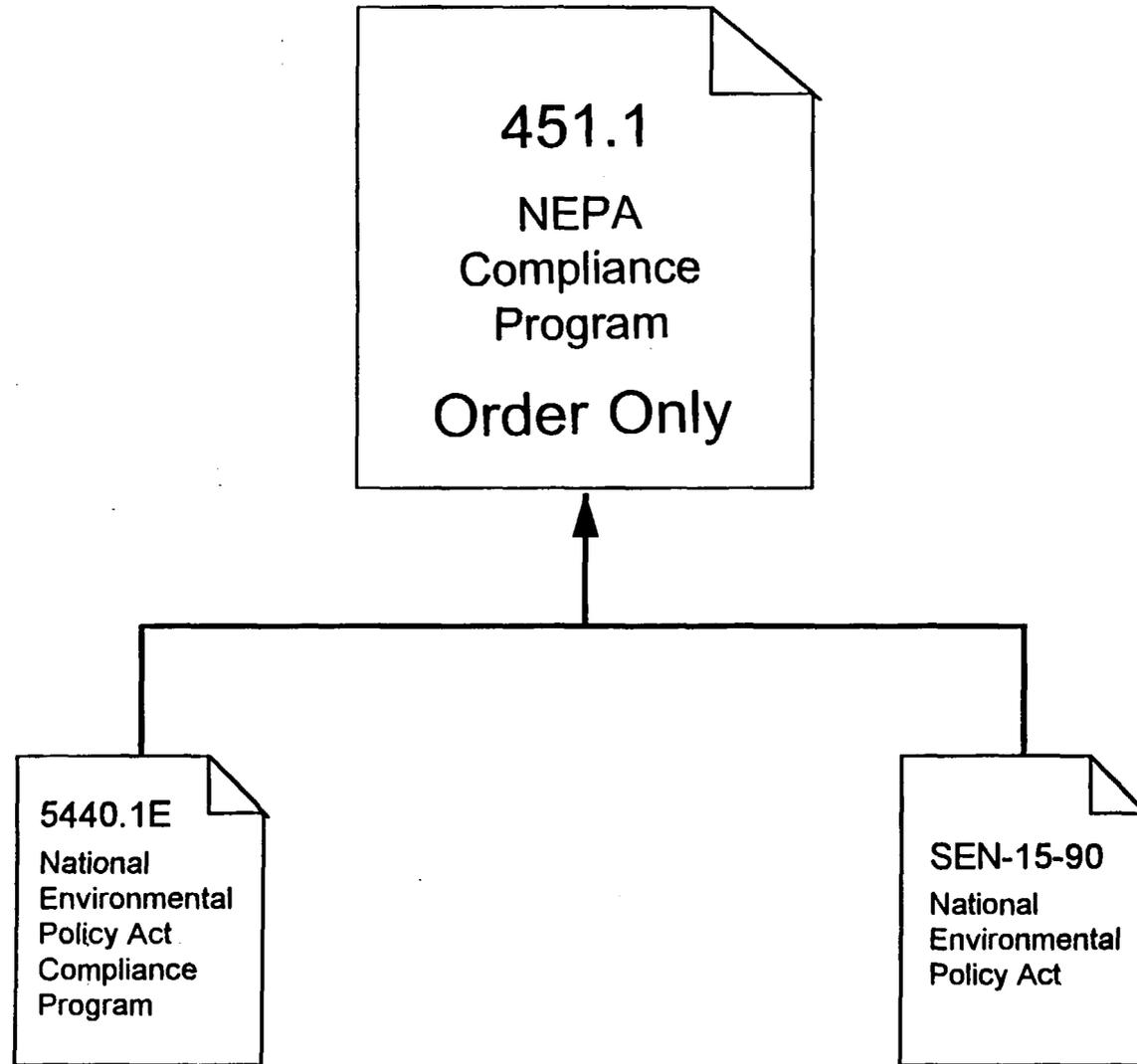


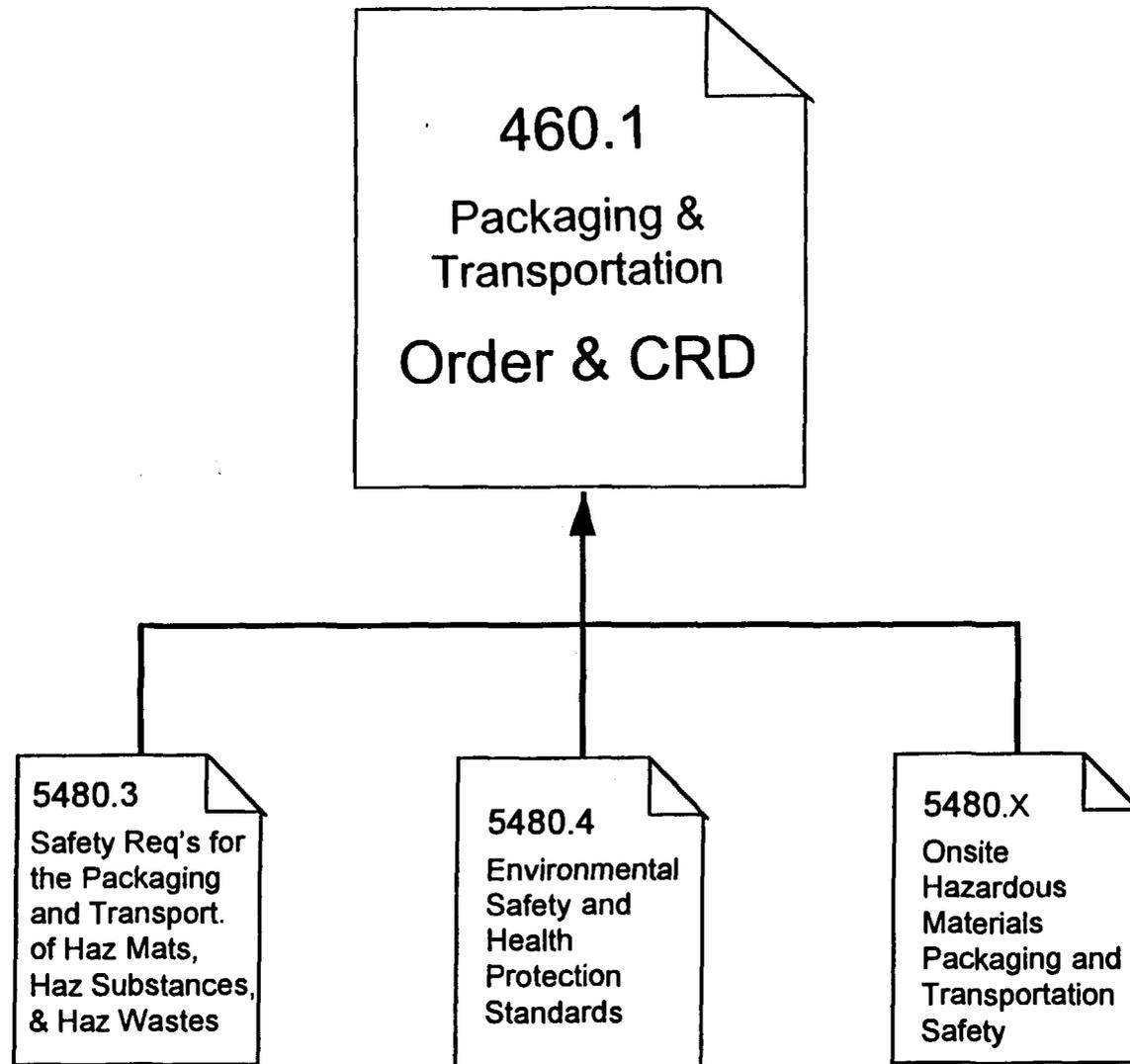












Disposition of Old DOE-EH Orders

Graphic Summary

1300.2A
DOE Technical Standards Program

Note! O1300.2A remains in effect pending policy statement or revision to Order

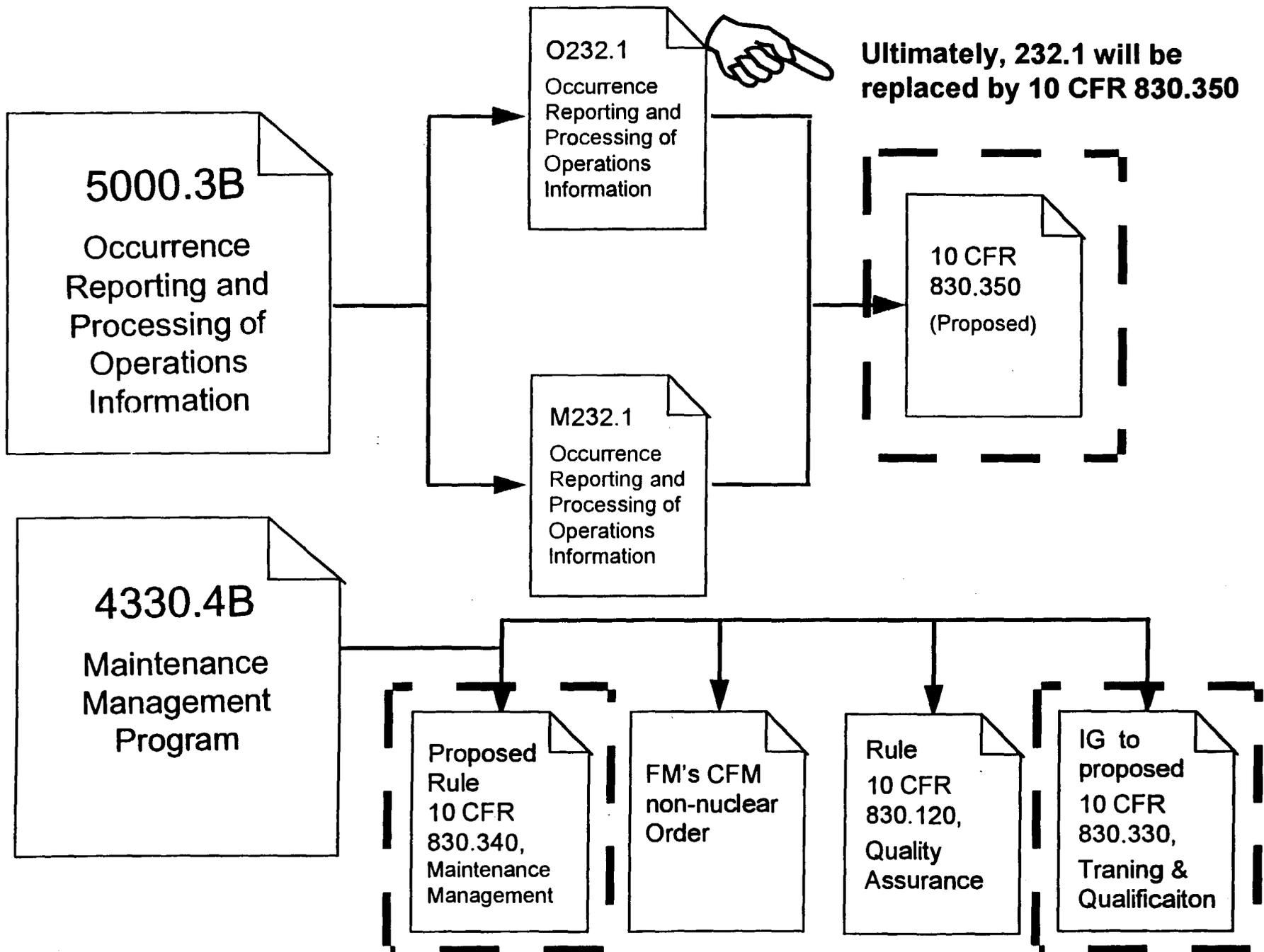


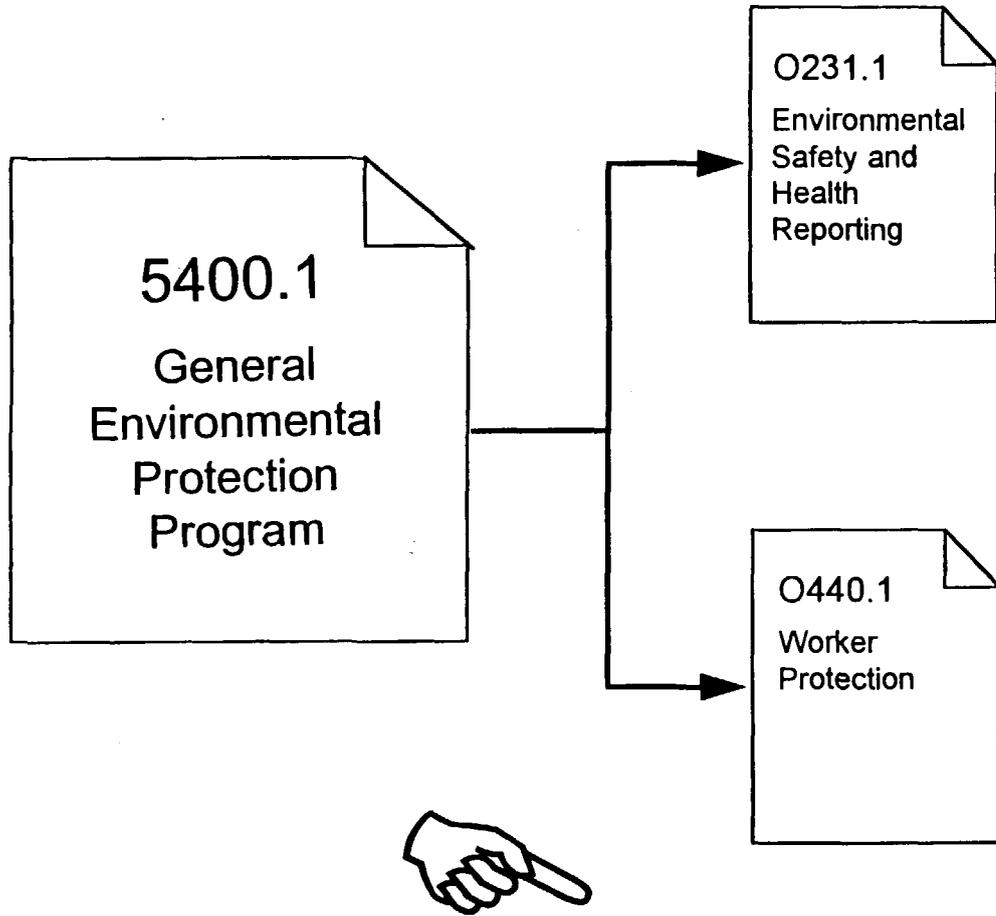
3790.1B
Federal Employee Occupational Safety & Health Program

O440.1
Worker Protection

IG440.1
Worker Protection

IG to proposed rule 10 CFR 830.330, Training and Qualification





Note! O5400.1 remains in effect and will be updated in the near future

5400.2A

Environmental
Compliance Issue
Coordination



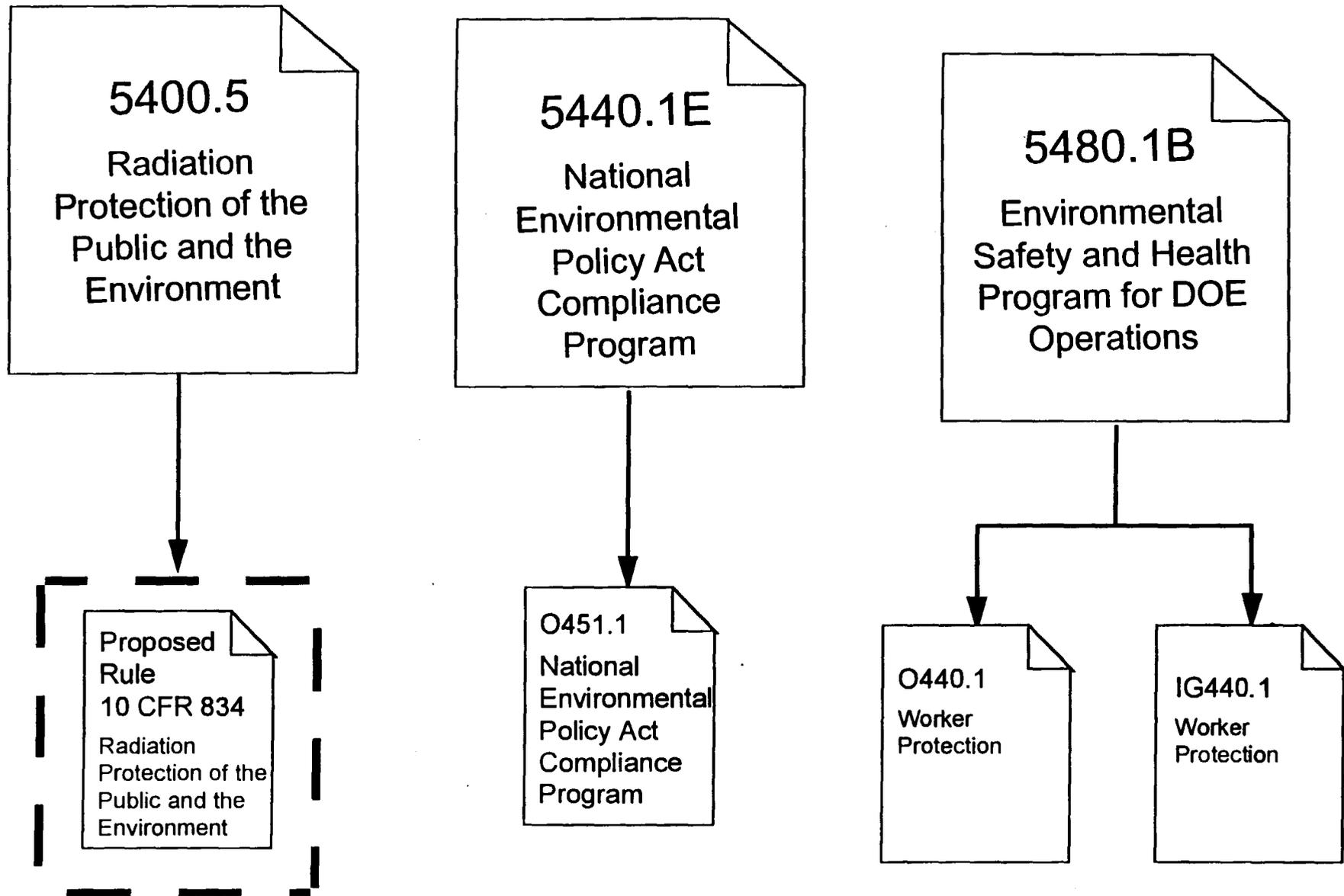
Note! O5400.2A has been cancelled

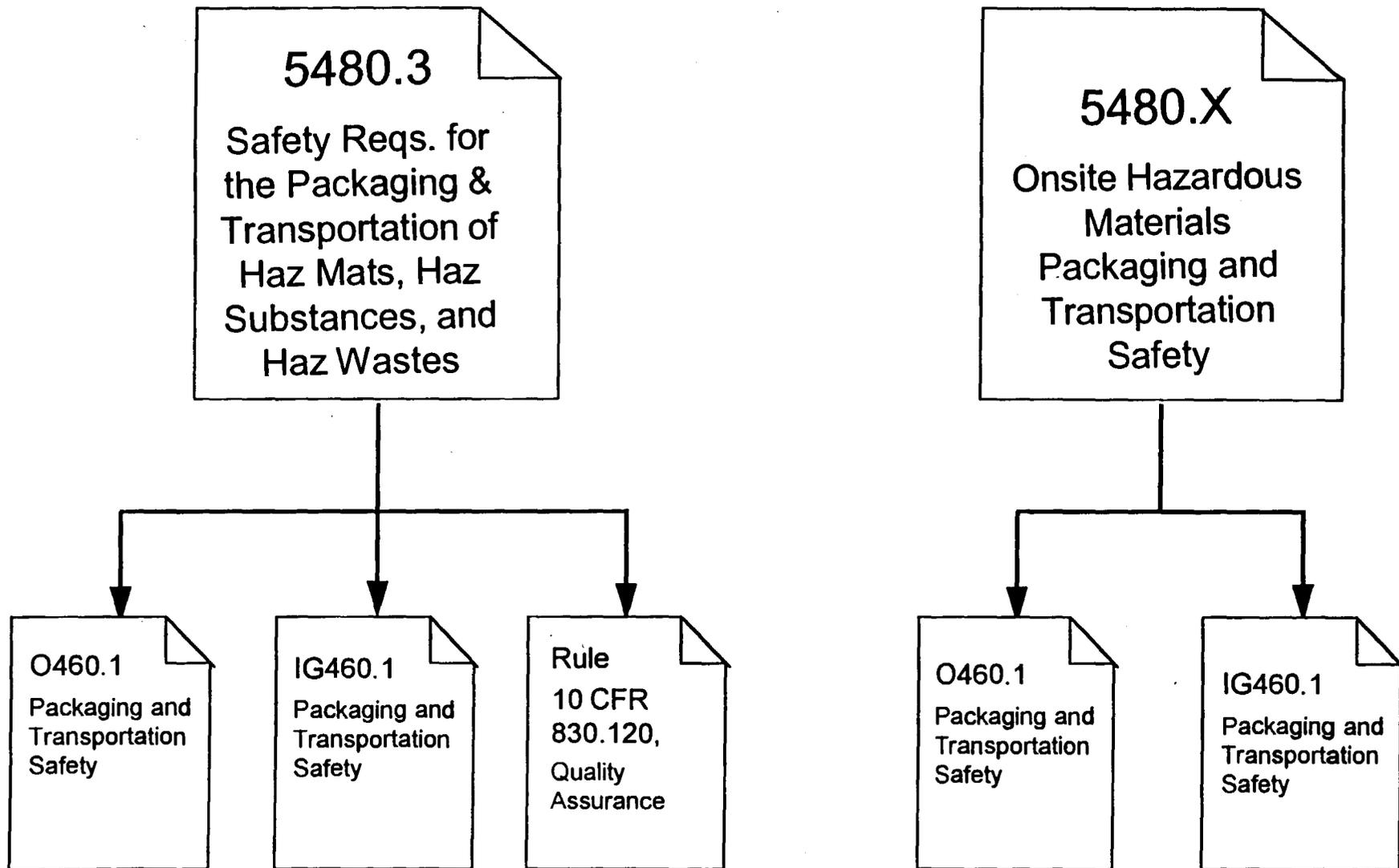
5400.4

Comprehensive
Environmental
Response,
Compensation,
and Liability Act
Requirements



Note! O5400.4 has been cancelled





5480.4
Environmental
Protection, Safety
and Health
Protection
Standards

5480.5
Safety of Nuclear
Facility



Note! O5480.5 has been cancelled

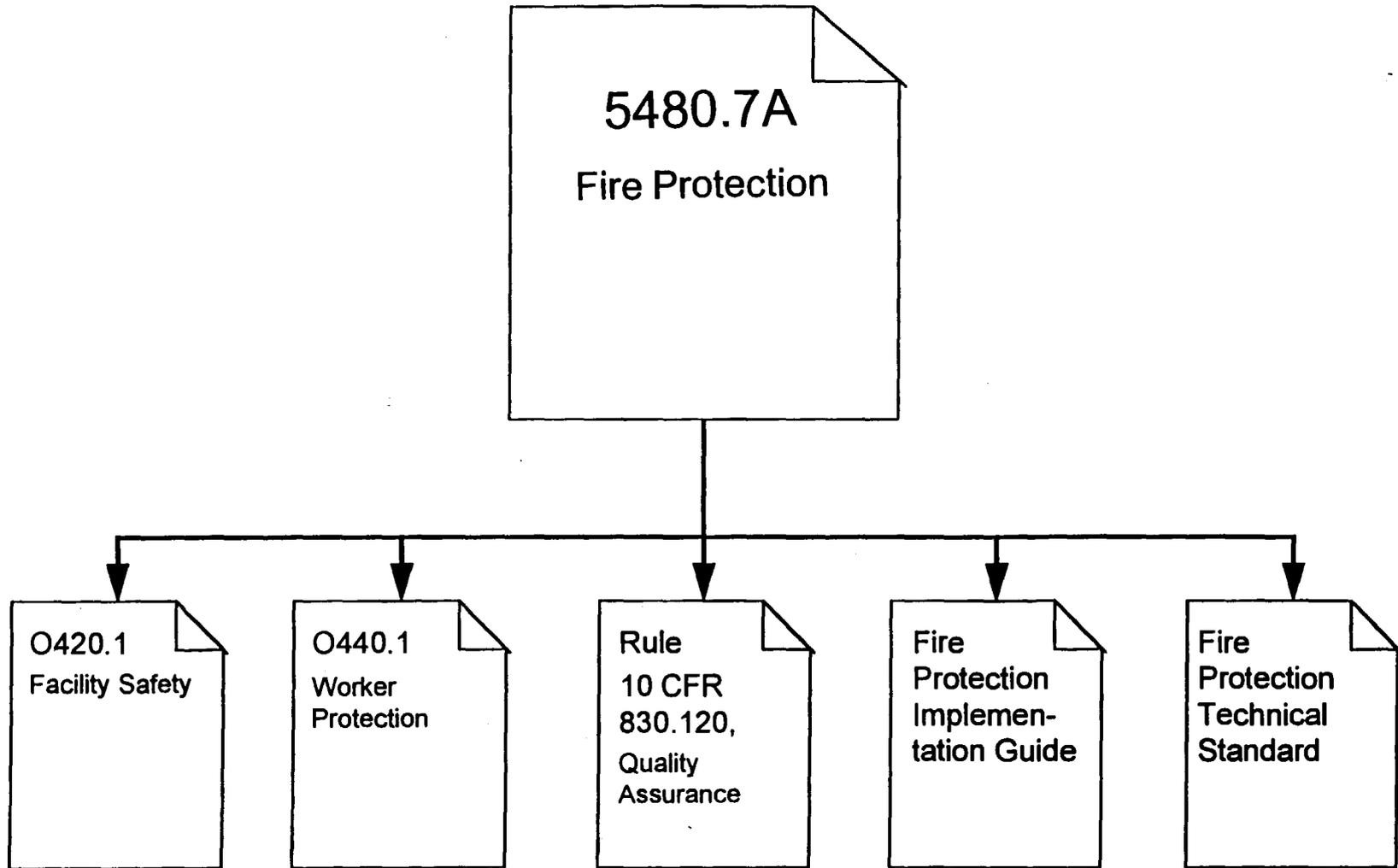
O440.1
Worker
Protection

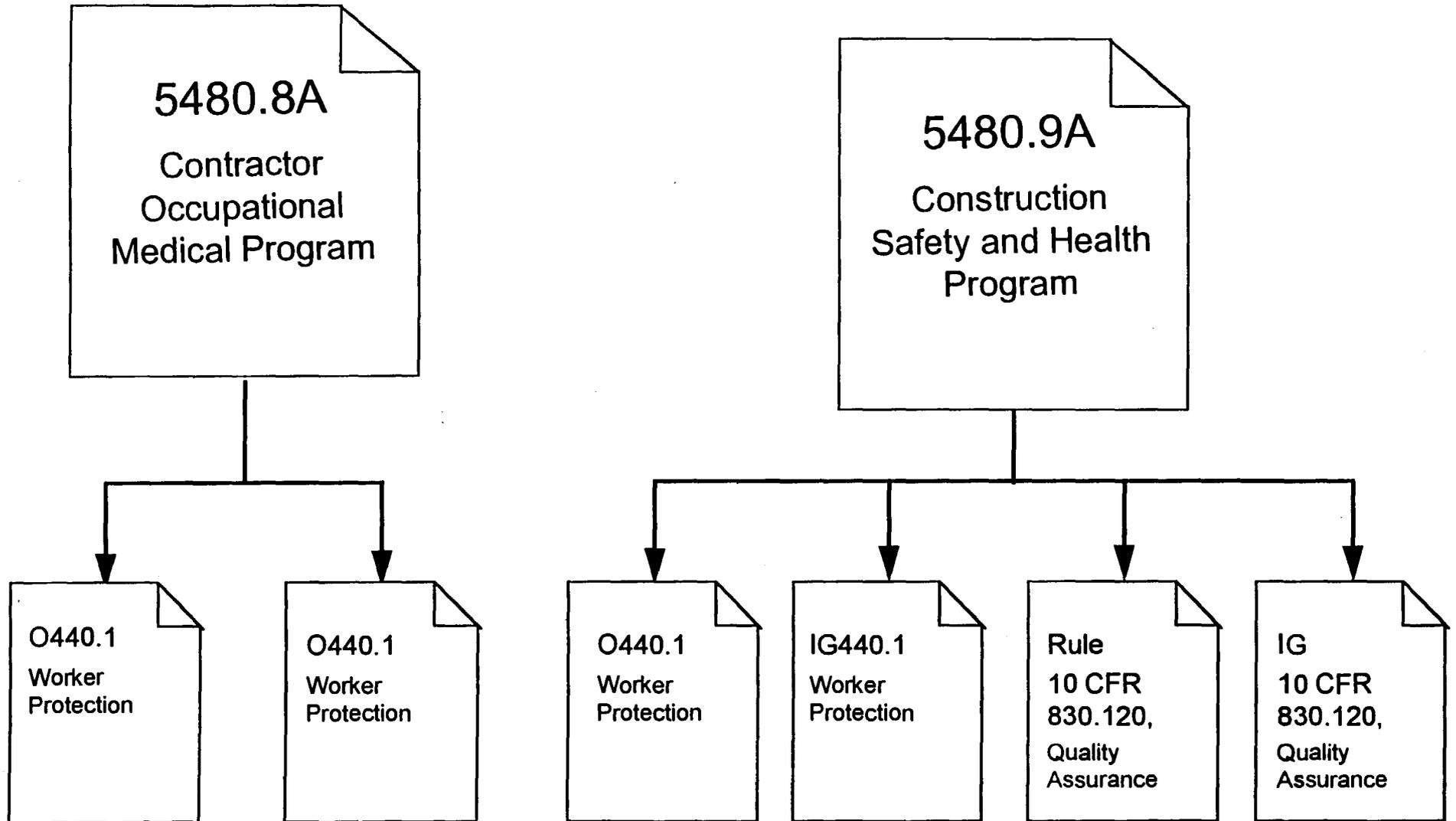
IG440.1
Worker
Protection

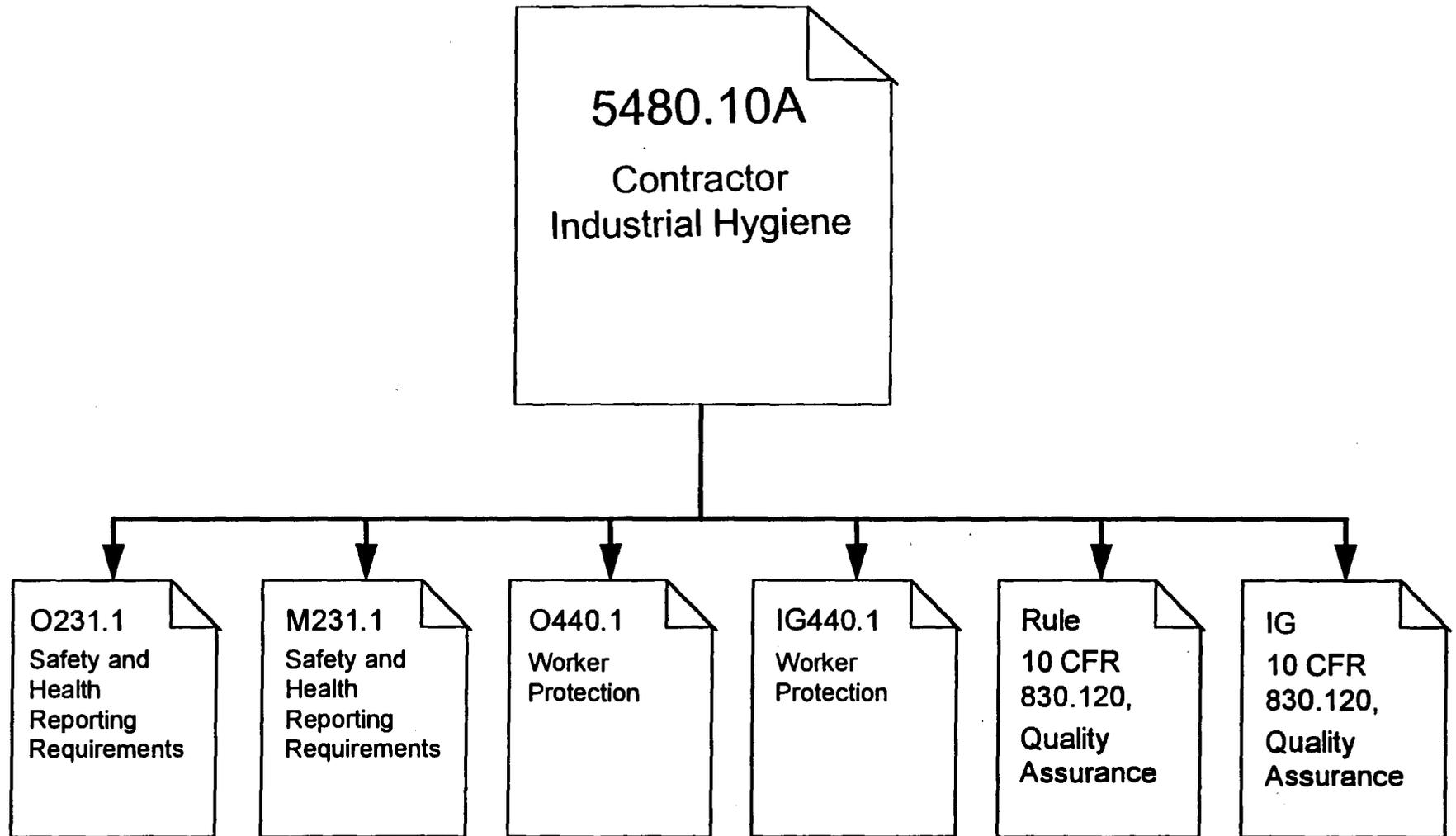
M440.1
Worker
Protection

O460.1
Packaging &
Transportation

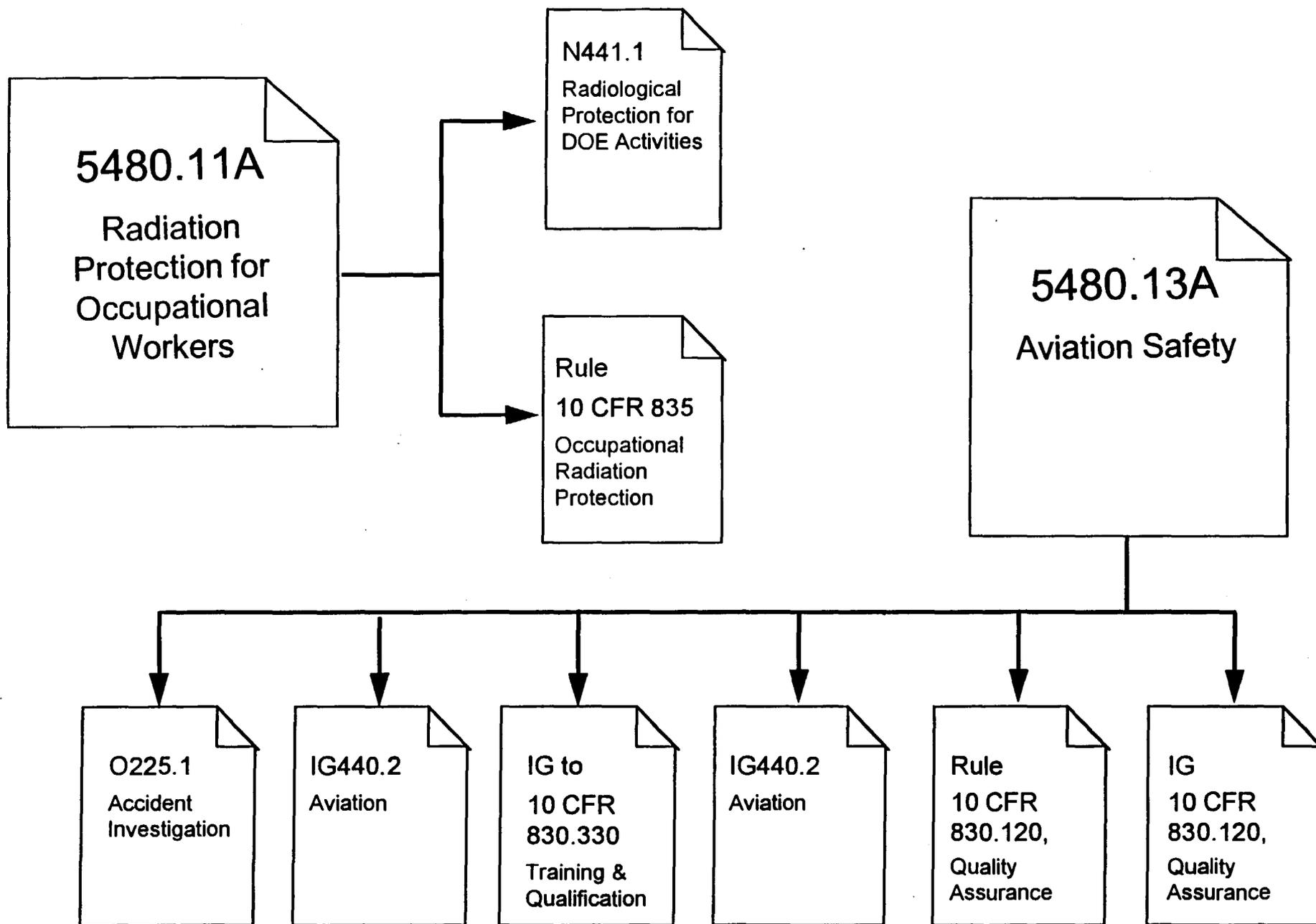
IG460.1
Packaging &
Transportation



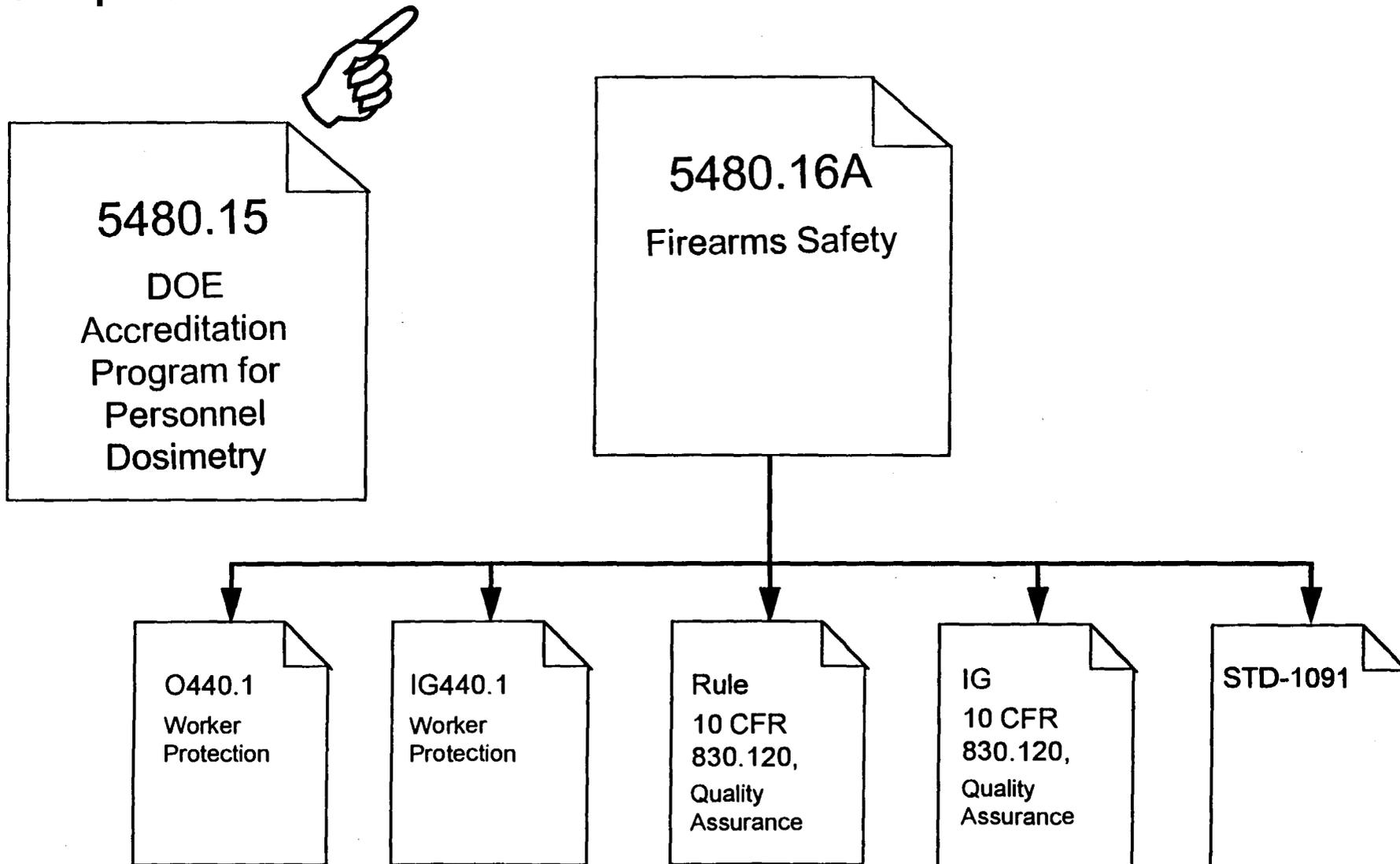




IG for Rule 10 CFR 830.330



**Note! O5480.15 has been largely deleted,
but some pieces have gone to 10 CFR 835,
Occupational Radiation Protection**

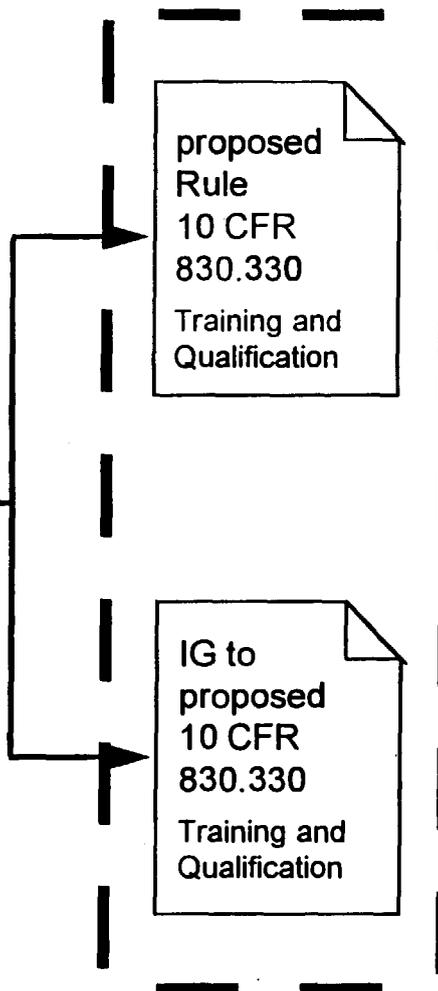


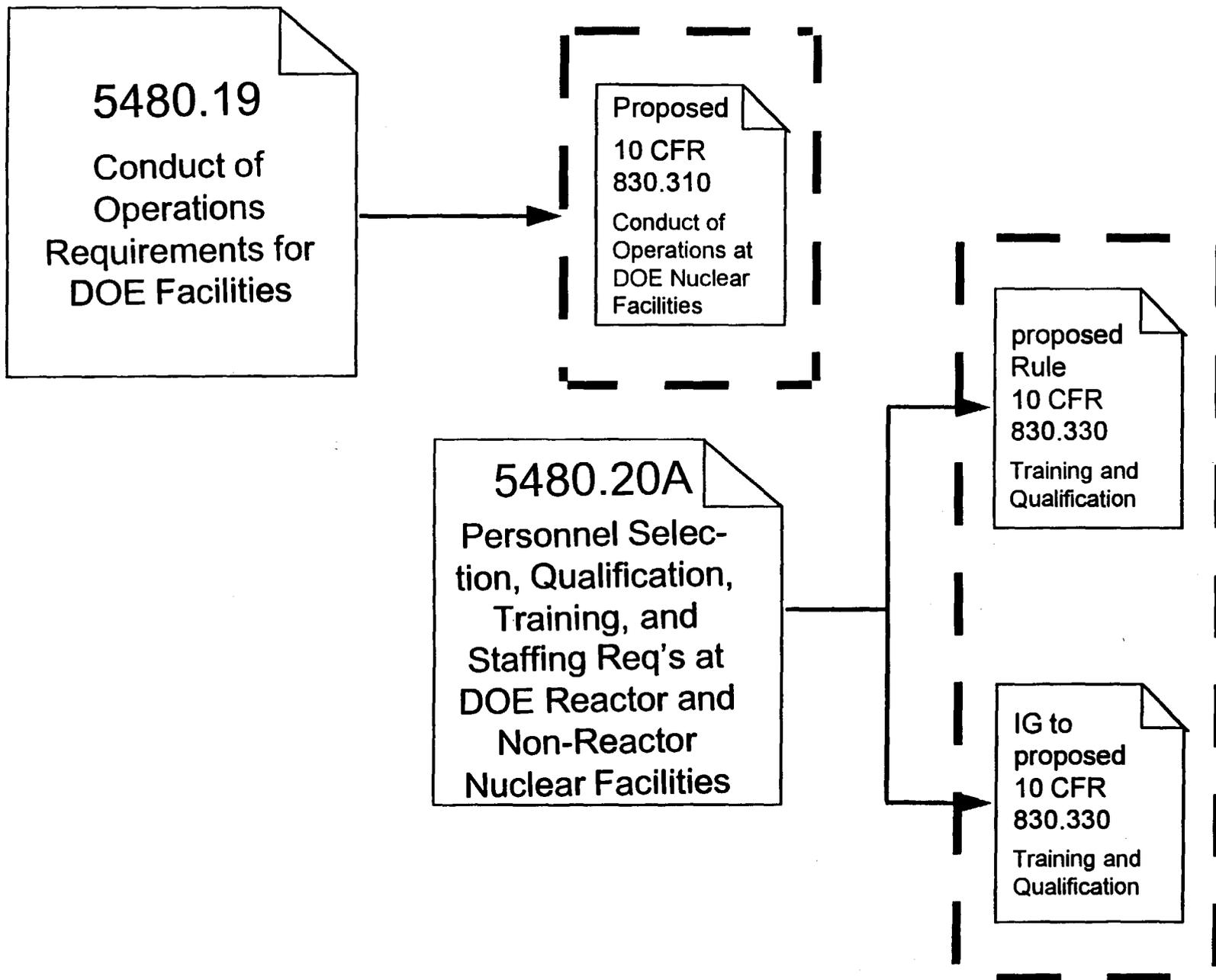
5480.17
Site Safety
Representatives



**Note! O5480.17 has been deleted;
responsibilities are to be captured
in the FAR Manual**

5480.18B
Nuclear Facility
Training
Accreditation
Program





5480.21
Unreviewed
Safety Questions



Proposed
10 CFR
830.112
Unreviewed
Safety
Questions

5480.22
Technical Safety
Requirements

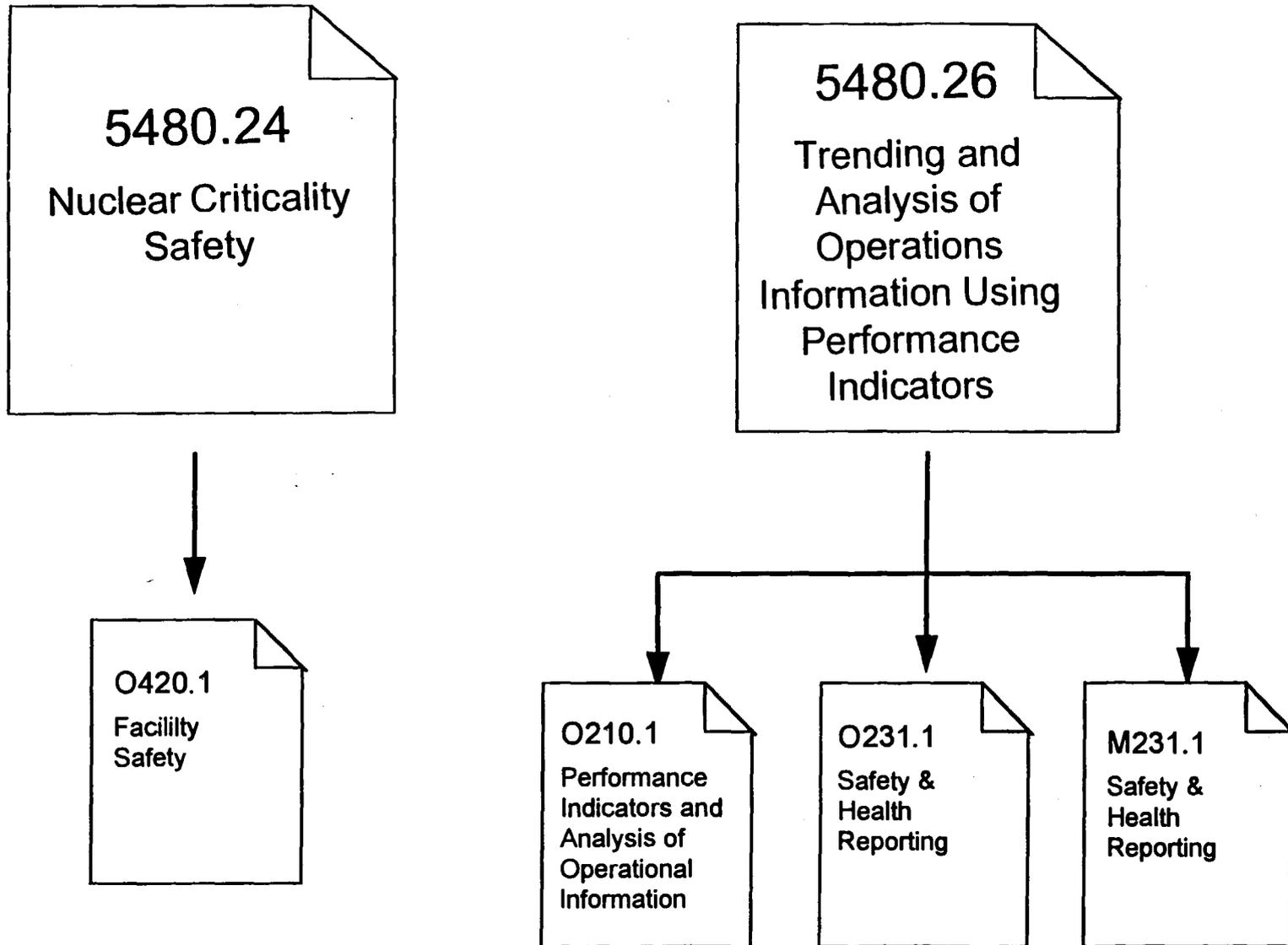


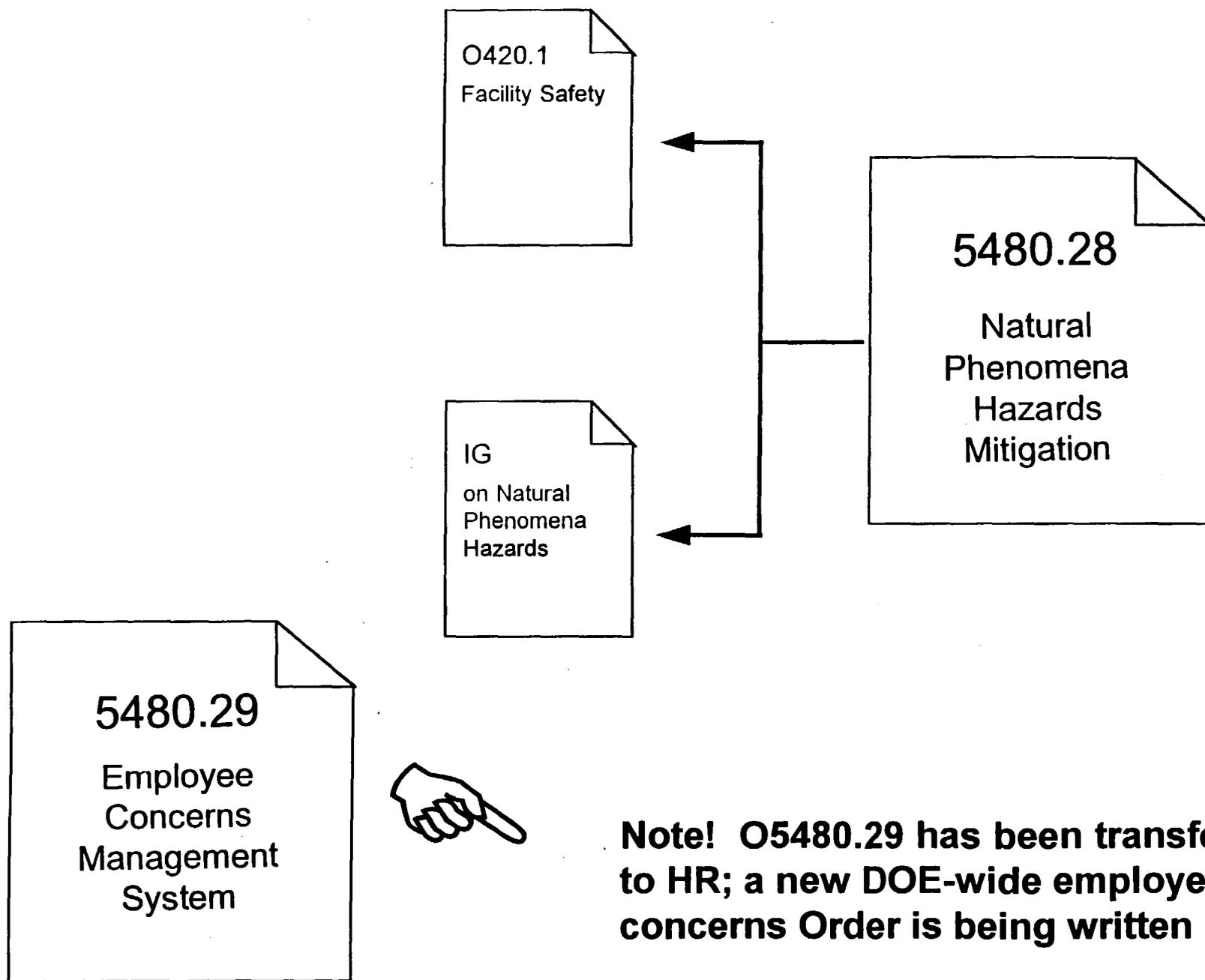
Proposed
10 CFR
830.320
Technical
Safety
Requirements

5480.23
Nuclear Safety
Analysis Reports



Proposed
10 CFR
830.110
Safety Analysis
Reports





Note! O5480.29 has been transferred to HR; a new DOE-wide employee concerns Order is being written

5480.30
Nuclear Reactor
Safety Design
Criteria

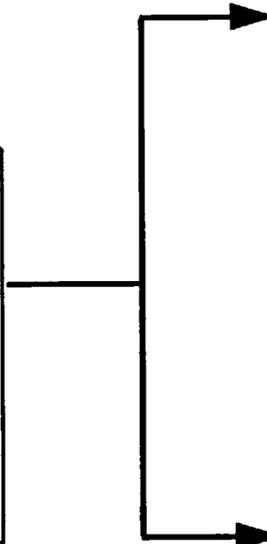


Note! O5480.30 remains in effect

5480.31
Startup and
Restart of Nuclear
Reactors

O425.1
Startup and
Restart of
Nuclear
Facilities

ORR
STD-3006-95

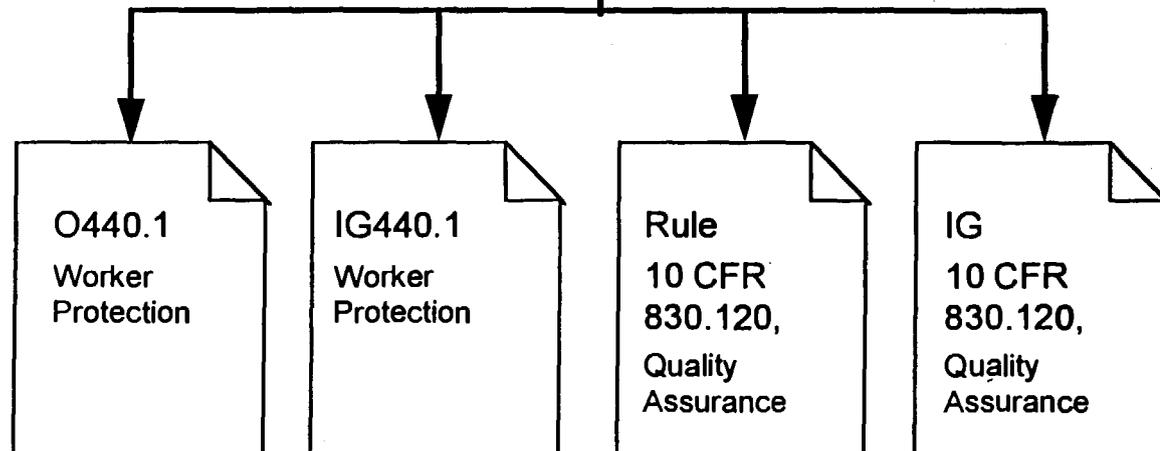


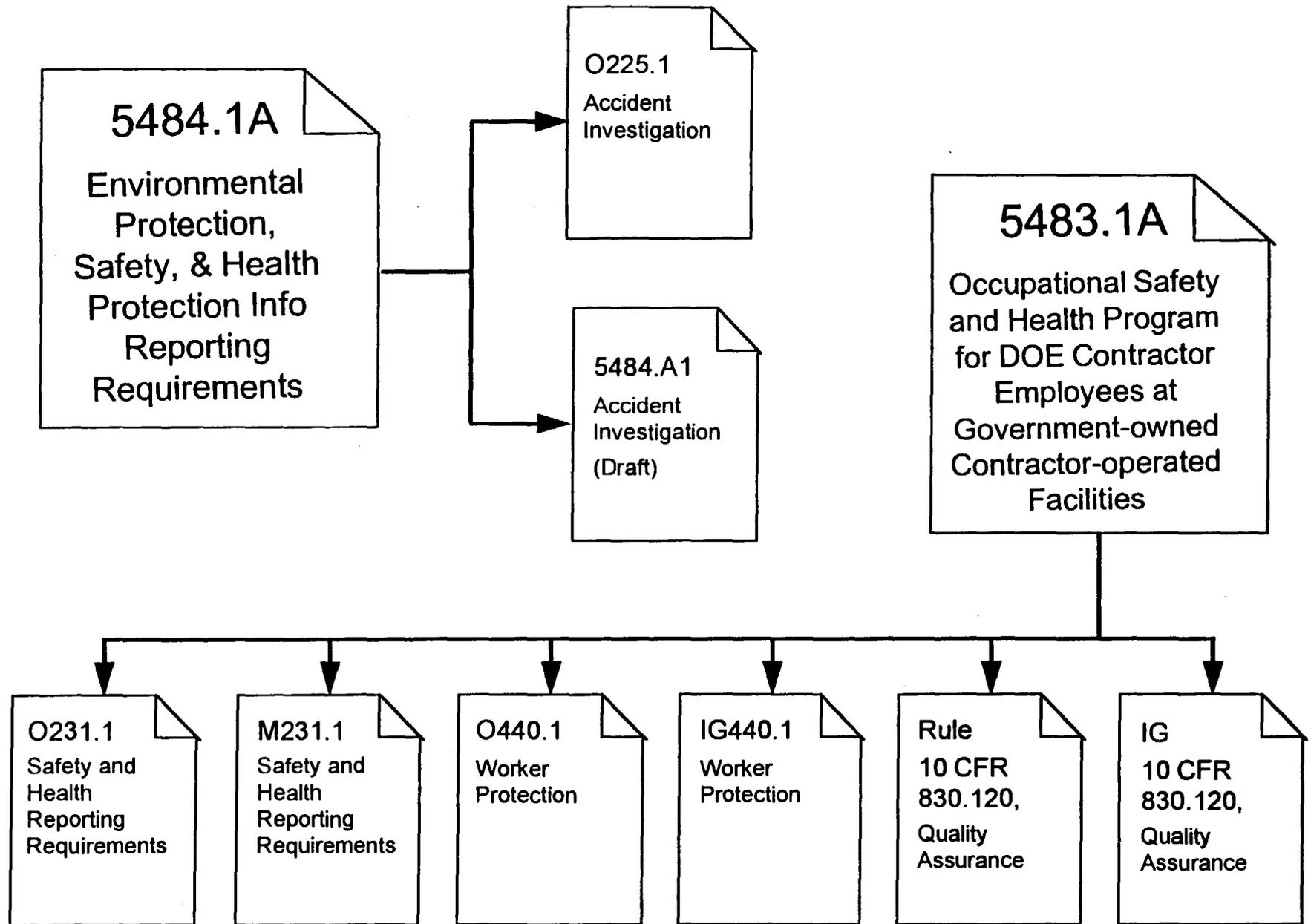
5481.1B
Safety Analysis
and Review
System

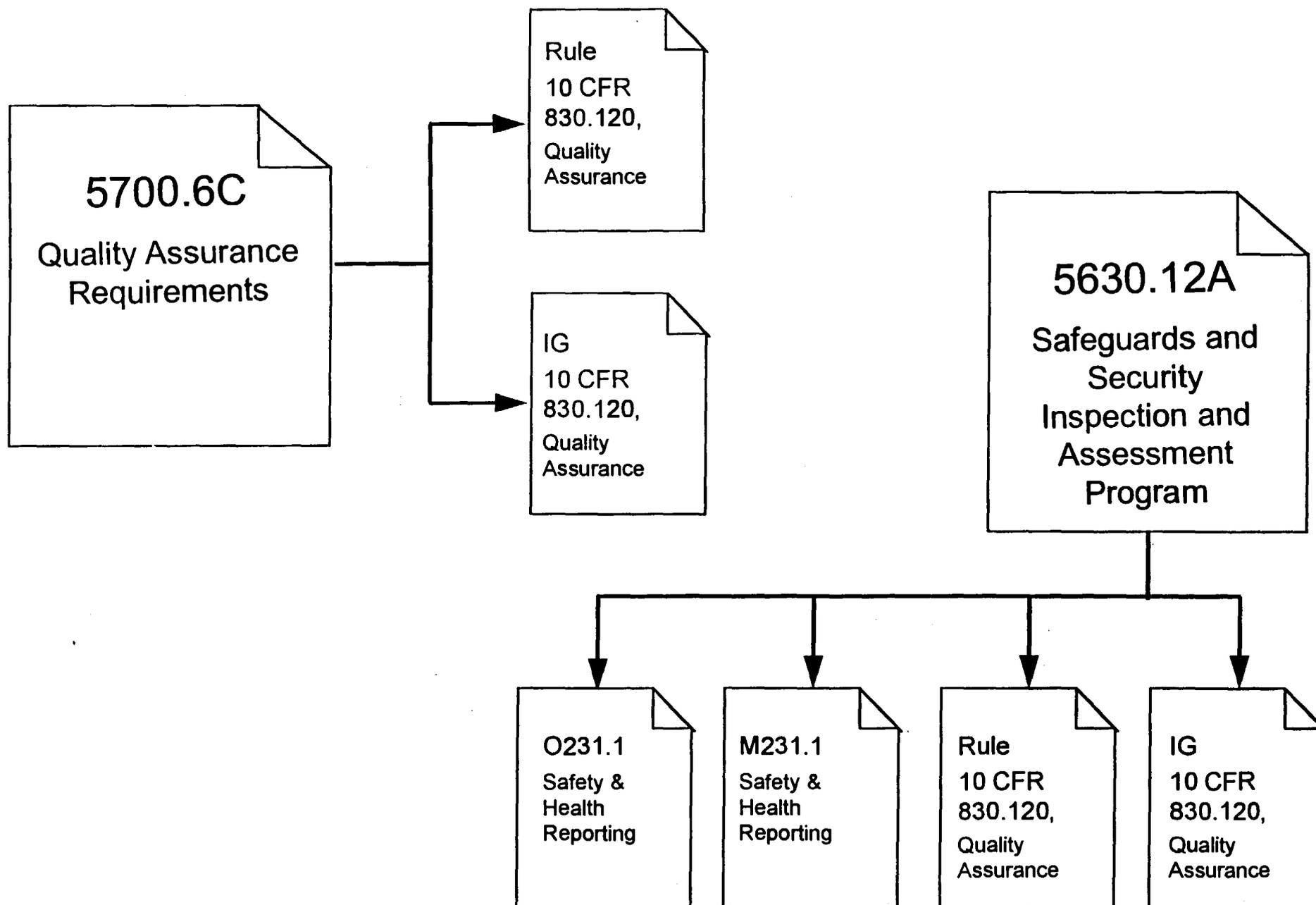


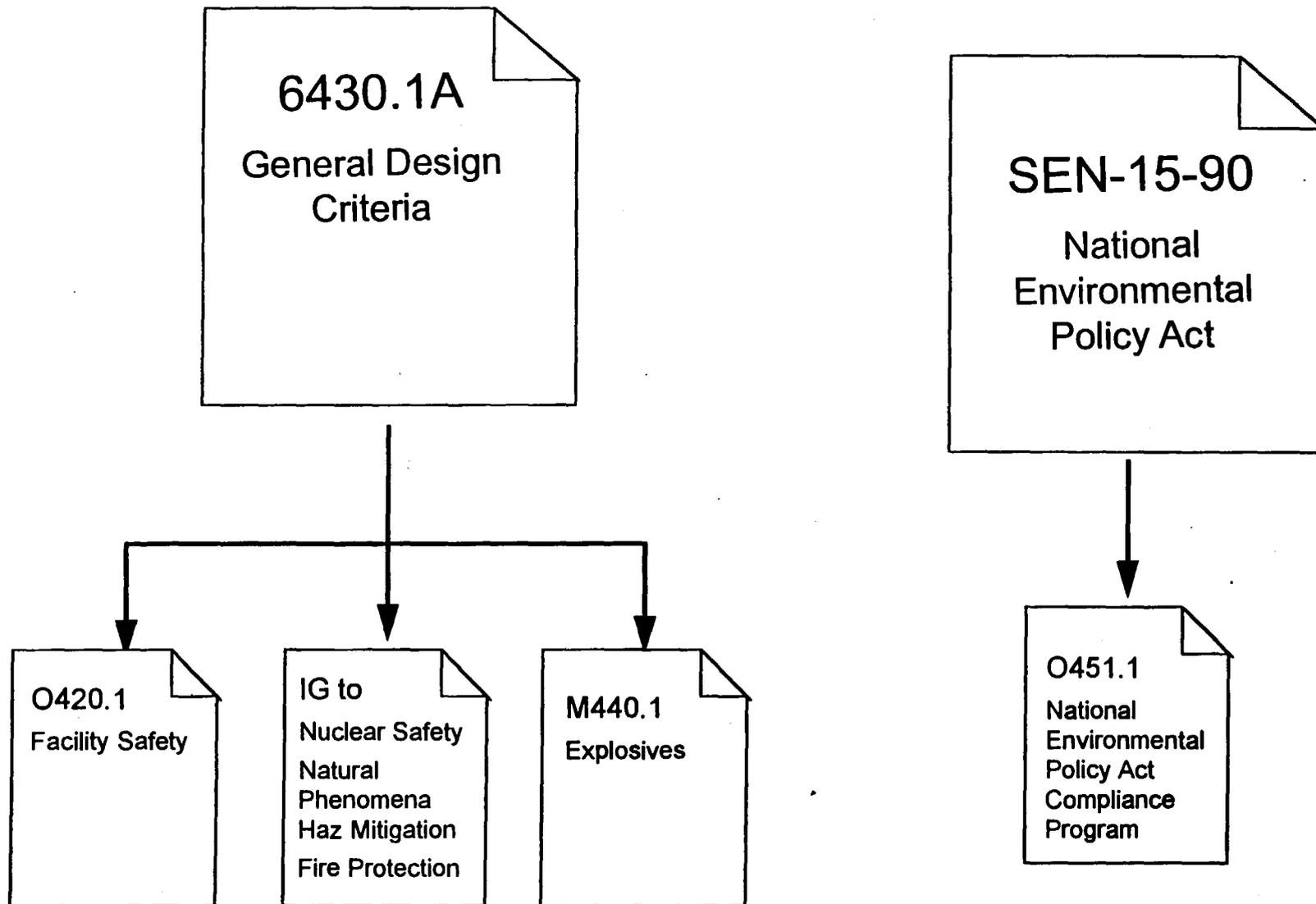
Note! O5481.1B remains in effect

5482.1B
Environment,
Safety, and
Health Appraisal
Program









SEN-22-90
DOE Policy on
Signatures of
RCRA Permit
Applications



Note! SEN-22-90 has been deleted

SEN-35-91
Nuclear Safety
Policy



**Note! SEN-35-91 is being
reissued as a policy
statement**

**RADCON
Manual**
Radiological
Health and Safety
Policy



**Note! the RADCON Manual is being revised
and published as a Technical Standard to
accompany N441.1 and 10 CFR 835**