



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

EXECUTIVE OFFICE

June 15, 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,  
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS

CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION

THOMAS A. MCDONALD

CHIEF COMPLIANCE OFFICER, COMPLIANCE AND GOVERNANCE (ACTING),  
BONNEVILLE POWER ADMINISTRATION

FROM:

LORRI BODI

VICE PRESIDENT, ENVIRONMENT, FISH & WILDLIFE, BONNEVILLE POWER  
ADMINISTRATION

SUBJECT:

DIRECTIVES EXEMPTION APPROVAL MEMORANDUM

**PURPOSE:** To document BPA's ongoing exemption from DOE Order 231.1B, *Environment, Safety, and Health Reporting*.

**BACKGROUND:** This Order establishes requirements for DOE facilities to report adverse environmental, safety and health events to the National Nuclear Security Administration (NNSA) and DOE.

**JUSTIFICATION:** Paragraph 3.c (3) of this DOE Order specifically expresses the following:

*"Consistent with Secretarial Delegation Order Number 00-033.00B to the Administrator and Chief Executive Officer, Bonneville Power Administration (BPA), this Directive does not apply to BPA (except for the requirements relating to the reporting of radioactive sealed sources, for which the requirements of this Directive will apply)."*

It should be noted that BPA operations do not generate any "radioactive sealed sources," and therefore request the language "except for the requirements relating to the reporting of

radioactive sealed sources, for which the requirements of this Directive will apply", be removed from paragraph 3.c (3) of the order.

It should also be noted, despite the broad language in the "Purpose" section of this Order, nearly 100% of the actual reporting requirements listed in the body of the Order are associated with incidents involving radioactive materials. Therefore, BPA should remain exempt from DOE Order 231.1B. If in the future, BPA does own, possess, use, or maintain in custody radioactive sealed sources that meet the reporting criteria, then the applicability to DOE O 231.1B will be further reviewed. If the order applied to BPA it would result in BPA collecting and entering empty data into DOE and NNSA reporting systems (i.e., not filing at least an annual report because no applicable incidents have occurred would not be an option).

I estimate that no less than 1 additional BFTE would be required to implement and comply with non-applicable reporting required by this Order, if BPA's exemption is relinquished.

**RECOMMENDATION:** Recommend that you approve this exemption document.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE: *Elliot Mainzer* DISAPPROVE: \_\_\_\_\_ DATE: 6/26/15

**CONCURRENCES/ CONSULTATIONS:** Melanie May, Office of Environment, Health, Safety and Security, AU.

cc:

Skila Harris

Senior Advisor, Power Marketing Administration, Department of Energy