

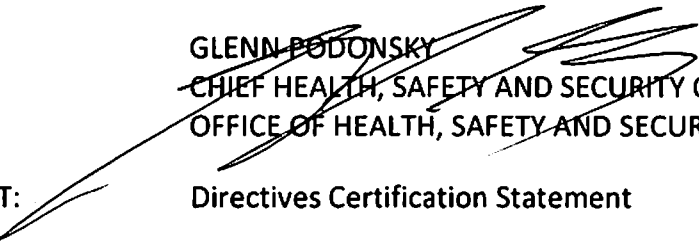


Department of Energy

Washington, DC 20585

November 3, 2010

MEMORANDUM FOR INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

FROM:  GLENN PODONSKY
CHIEF HEALTH, SAFETY AND SECURITY OFFICER
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT: Directives Certification Statement

The purpose of this memorandum is to notify you that the Office of Health, Safety and Security (HSS), consistent with the requirements of Paragraph 7.a. of Department of Energy (DOE) Order (O) 251.1C, has reviewed the following two directives:

- DOE Manual (M) 441.1-1, *Nuclear Safety Packaging Manual*, March 7, 2008, and
- DOE O 5480.30, *Nuclear Reactor Safety Design Criteria*, January, 19, 1993.

On the basis of our review, we have determined that both directives continue to be relevant and effective. They remain a necessary part of the DOE nuclear safety requirements system.

That notwithstanding, both directives will require updating. However, HSS, with active support of the DOE program and field offices, is presently conducting numerous simultaneous directives updates. Due to resource constraints, these updates must be accomplished consistent with needs-based priorities. Based on our review, with input from the Executive Steering Committee for the nuclear safety directives reform topical area, we have determined that the revision of these two directives is not a priority. As a result, we are scheduling their revision as discussed below.

- DOE O 5480.30 is in the old four digit format and requires revision to be consistent with the current directives system requirements and to update to reflect organization changes since 1993. However, the general requirements are still appropriate and relevant. There is no critical near-term need to revise this directive. Delaying these changes will not affect safety. In addition, updates to related requirement documents currently in process will allow for more informed update of DOE O 5480.30, including consideration as to whether a specific DOE directive addressing reactor design criteria is needed. As a result, we plan to review the current and expected future use of DOE O 5480.30 to determine whether it needs to




be revised, or whether it can be archived. We expect to provide a Justification Memorandum with our recommended path forward in late 2011.

- DOE M 441.1-1 is just two years old. It has been evaluated and determined to be accurate as required by DOE O 251.1C, and is relevant and effective. The Manual's four year review for continued relevance is due March 2012. Therefore, HSS is proposing to initiate the conversion of DOE M 441.1 to the DOE order format at that time.

As noted, these certifications and plans were reviewed by the Executive Steering Committee for the nuclear safety directives reform, including the Chief of Defense Nuclear Safety and the Chief of Nuclear Safety, and found acceptable.

I certify that these directives continue to be relevant and appropriate for use by the Department, and that the Order and Manual can remain in use and effectively meet DOE safety needs until they are revised consistent with the proposed approach.

For additional information please contact Mark Blackburn, Office of Nuclear Safety Policy and Assistance, at (301) 903-8396.

Concur:  Nonconcur: _____ Date: 11-18-10