



Department of Energy
Washington, DC 20585

May 29, 2013

MEMORANDUM FOR INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

JM CHRONOLOGY

JM RECEIVED 5/29/13
OUT FOR REVIEW 6/10/13
DRB DISCUSSION 6/20/13

THROUGH: KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

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

SUBJECT: Notice of Intent to Revise Department of Energy Guide 423.1-1A,
Implementation Guide for Use in Developing Technical Safety Requirements

PURPOSE: This memorandum provides justification to revise Department of Energy (DOE) Guide (G) 423.1-1A, *Implementation Guide for Use in Developing Technical Safety Requirements*, dated November 3, 2010. The purpose of this revision is to incorporate lessons learned as identified by program offices.

JUSTIFICATION: DOE G 423.1-1A was originally developed and issued in October 2001 in support of 10 Code of Federal Regulation (CFR) 830, Subpart B, *Safety Basis Requirements*, also issued in 2001, and provides guidance for meeting the associated provisions for Technical Safety Requirements (TSR), defined in 10 CFR 830.205.

In 2010, a limited-scope revision to the Guide was conducted to incorporate an appendix that provides guidance for performing Implementation Verification Reviews (IVRs) of safety basis controls.

As part of the one-year accuracy review of the November 2010 change to the Guide, as required by DOE Order (O) 251.1C, *Departmental Directives Program*, Section 7, additional changes to the Guide were identified by the program offices to make it more complete and effective; which include the need to: (1) add a section on the development and use of Specific Administrative Controls (SAC); (2) clarify guidance on selection of the TSR surveillance requirement frequency; (3) provide additional guidance on how to address TSR violations for Administrative Controls and SACs; (4) provide guidance on maintenance of TSRs Design Features; and (5) address numerous discrete improvements that sites have discovered as they have used the Guide over the years. These changes are more substantive in scope than may be accomplished via an administrative change notice; therefore, a full revision is needed to



address the desired changes identified by the program offices responsible for implementation. This will be the first full-scope revision to this Guide since its original issuance in 2001.

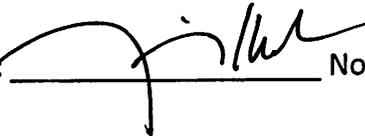
This revision will be drafted by a multidisciplinary team with representatives from the National Nuclear Security Administration and the Offices of Science, Nuclear Energy, and Environmental Management. The requested schedule for revision development is provided below.

There is no valid external consensus or other standards (e.g., International Organization for Standardization, Voluntary Protection Program, etc.) available which can be used in place of this directive because this is a DOE-unique process and application.

IMPACT: The Guide does not duplicate existing laws, regulations or national standards and it does not create undue burden on the Department. Incorporation of lessons learned into the Guide should result in more consistent and appropriate use of the Guide and ultimately result in long-term efficiencies and cost savings across the DOE complex.

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Concur:  Nonconcur: _____ Date: 6-21-13

Justification Memorandum (Continued)

<u>Requested Schedule for Directives Development</u>	<u>Days</u>
Draft Development	60
Review and Comment	30
Comment Resolution	30
Final Review	30
Total	150