



Department of Energy
Washington, DC 20585

MEMORANDUM FOR INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

JM CHRONOLOGY
JM RECEIVED 3/20/11
OUT FOR REVIEW 5/13/11
DRB DISCUSSION 5/11/11

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 433.1-1, *Nuclear Facility Maintenance Management Program Guide for Use with DOE O 433.1*, dated September 5, 2001.

PURPOSE: This revised memorandum provides justification for revision to Department of Energy (DOE) Guide (G) 433.1-1, *Nuclear Facility Maintenance Management Program Guide for Use with DOE O 433.1*, dated September 5, 2001. DOE G 433.1-1 is the primary guide supporting DOE Order (O) 433.1B, *Maintenance Management Program for DOE Nuclear Facilities*, which was recently revised and issued April 21, 2010. The Guide needs to be revised to keep it consistent with the Maintenance Management Program Order. This revised memorandum, updated per the Directive Review Board's decision on November 18, 2011, more clearly states that there is no external standard available that is appropriately tailored to DOE nuclear maintenance program requirements (see summary of development process below).

JUSTIFICATION:

Background. DOE G 433.1-1 was originally issued in September 2001 and included guidance previously contained in DOE O 4330.4B, *Maintenance Management Program*. DOE G 433.1-1 describes a nuclear maintenance management program (NMMP) that met the associated Order requirements for developing and implementing a NMMP. Safety management programs, such as the NMMP, are essential for ensuring that nuclear facilities are operated in a manner that adequately protects workers, the public, and the environment.

Summary of Development Process. The proposed revision to the Guide will be completed by a writing team of subject matter experts which will be led by the Office of Nuclear Safety Policy and Assistance within the Office of Health, Safety and Security (HSS). During the revision, external standards will continue to be reviewed for applicability and use. At this point, no valid external standards have been identified as appropriately tailored for implementing the DOE nuclear maintenance program requirements in DOE O 433.1B.



The writing team will follow the directives update process with multiple reviews, including the DOE-wide review in RevCom. As part of the Department's 2010 safety and security directives reform effort, the revision will be reviewed prior to entry into RevCom by the Nuclear Safety Directives Reform Steering Committee, which will serve as the "Red Team" to ensure a quality revision is entered into DOE-wide review.

Applicability. The applicability of the Guide is the same as that for the Order: DOE nuclear facilities. No changes in applicability are planned.

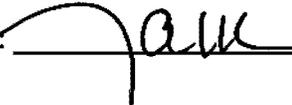
Major Changes. The revised DOE G 433.1-1 will correlate with the recent revision of DOE O 433.1B. The revision to the Order clarified and refined DOE and contractor requirements and made clear the relationship of the Order to its overarching nuclear safety regulation, 10 Code of Federal Regulations 830, *Nuclear Safety Management*.

Recommended Development Schedule. The proposed schedule for directives development is provided below.

IMPACT: The proposed revision to DOE G 433.1-1 will not place any new requirements on DOE or its contractors. The Guide will be consistent with DOE O 433.1B by principally focusing on clarification and streamlining of guidance. Guidance that will be modified is anticipated to result in minor or in some cases no cost to DOE or its contractors. The improvements made in the proposed revision of the Guide should facilitate consistent implementation of and foster continuous improvement in this important safety management program.

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OPI/OPI CONTACT: James O'Brien, Office of Nuclear Safety Policy and Assistance, (301) 903-1408.

Concur:  Non-concur: _____ Date: 5-19-11

Timeline: Schedule for Directives Development	<u>Standard</u> (Days)	<u>Proposed</u> (Days)
Draft Development (Writer)	60	30
Review and Comment (Interested Parties)	30	45
Comment Resolution (Writer)	30	45
FINAL REVIEW	30	45 30
Total	150	150

NOTE: SCHEDULE CHANGE
TO 150 DAYS EFFECTIVE
4/14/2011. CB

TO: DRB CHAIR
WRITER IS REQUESTING
ADDT'L TIME FOR
REVIEW/COMMENT (45 DYS.)
AND COMMENT RESOLUTION (45 DYS.)
ⓧ COMPLETION # OF DAYS
REMAINS 150.