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February 5, 1999

Mr. G. Mike McCann
Senior Radiation Specialist
Decommissioning Branch
U.S. Nuclear Regulatory Commission
Region III
801 Warrensville Road
Lisle, IL 60532-4351

Dear Mr. McCann:

Subject: **Battelle Memorial Institute Special Nuclear Materials License SNM-7, Docket 070-00008**

Reference:

1. Letter from George M. McCann to Steve Layendecker, "Battelle Columbus Laboratories Decommissioning Project (BCLDP) - Request to Change Decommissioning Schedule, Review of BCLDP Procedure, 'Control of Revisions to Radiation Protection Program Documents'(HP-AP-36.0), Clarification of Radioactive Material License Possession Limits," dated January 21, 1999

2. Letter from Steve Layendecker to George M. McCann, "Request for a Schedule Revision to the BCLDP," dated December 8, 1998

The following are Battelle Memorial Institute's responses to the NRC correspondence dated, January 21, 1999, Mail Control Number 397559, with regard to the Battelle Memorial Institute Decommissioning License SNM-7, Docket 070-00008.

Revision to BCLDP Decommissioning Schedule

Battelle has provided the local Department of Energy (DOE) Project Manager, Mr. Thomas Baillieul, a copy of the January 21, 1999 referenced letter. The BCLDP Manager, Mr. Len Ermold and Mr. Baillieul have talked on this issue. Since this is a complex issue with significant ramifications, Battelle requests a 60-day extension be granted to respond to this subject.

FEB 08 1999

Proposed Health Physics Administrative Procedure (HP-AP-36.0)

Attached, please find the two finalized procedures you had previously reviewed in draft, HP-AP-36.0, Rev 0, *Control of Revisions to Radiation Protection Documents*, and QD-AP-6.1, Rev 10, *Document Control*. The QD-AP-6.1 procedure contains the forms not in the HP-AP-36.0 procedure and is the only cross-referenced procedure.

Clarification of License Possession Limits

Battelle has reviewed its recent submissions to the NRC on SNM and Source possession limits, specifically, SNM-7 major amendment submission dated September 1, 1994 to Mr. Kevin Null and the last complete presentation of Battelle's possession limits in Amendment 10 dated April 27, 1995. Battelle has updated the possession limits to reflect current knowledge. Please note that they are not significantly different than either of the previously identified quantities, except for the shifting of the majority of the unirradiated fuel inventory to irradiated, and decreasing the source material inventory due to progress in clean up of the major locations of source material use, which were almost entirely at King Avenue.

Special Nuclear Material	**Chemical or Physical Form**	**Maximum amount to be Possessed at one time**
A. Uranium enriched in the U-235 isotope - Irradiated	A. Any	A. 125 grams of contained U-235 plus the associated and unseparated plutonium
B. Uranium enriched in the U-235 isotope - Unirradiated	B. Any	B. 10 grams of contained U-235
C. Uranium enriched in the U-235 isotope - Unirradiated	C. Plated/Sealed	C. 1 gram of U-235 total
D. Plutonium (any principal isotope Pu 238-244)	D. Sealed Sources	D. 0.1 gram total
E. Plutonium (Pu-238 principal isotope)	E. Oxide	E. 10.3 grams
F. Plutonium (Pu-239 principal isotope)	F. Metal or Oxide	F. 17 grams
G. Neptunium-237	G. Sealed Source	G. 1.0 microCurie
H. Plutonium (Pu-238 principal isotope)	H. PuBe Source	H. 0.053 grams
I. Plutonium (Pu-238 principal isotope)	I. Diffuse Waste	I. 3.4 grams

J. Plutonium (Pu-239 principal isotope)	J. Diffuse Waste	J. 3.0 grams

Source Material	Chemical or Physical Form	Maximum amount to be Possessed at one time
A. Any Source Material	A. Any	A. 50 kilograms total

As you had requested, I am also providing a summary 10 CFR 150.11 calculation.

U-235 Components	Pu Components
A. 125 grams	A. 131.2 grams
B. 10 grams	B. 0 grams
C. 1 grams	C. 0 grams
D. 0 grams	D. 0.1 grams
E. 0 grams	E. 10.3 grams
F. 0 grams	F. 17 grams
H. 0 grams	H. 0.1 grams
I. 0 grams	I. 3.4 grams
J. 0 grams	J. 3.0 grams
Sum divided by 350 = 136/350 = 0.389	Sum divided by 200 = 165.1/200 = 0.826
	Grand Total (U + Pu Subtotals) = 1.215

Since the formula yields a sum of fractions greater than 1.0, the exception granted in Section 150.10 does not apply. As you recall, the plutonium in Item A was generated from the irradiation of U-235 which to approximately 33 kMWD/MTU.

If you have any questions, please do not hesitate to call me at (614) 424-3885, or my Associate RSO, Craig Jensen at (614) 424-5170.

Sincerely,

Craig E. Jensen for

Stephen J. Layendecker, CHP
Safety Health and Environmental
Support Manager/Radiation Safety Officer

Attachment(2)

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HP-AP-36.0
Revision 0

DECONTAMINATION AND DECOMMISSIONING OPERATIONS (DDO)

HEALTH PHYSICS ADMINISTRATIVE PROCEDURE (HP-AP)

Control of Revisions to Radiation Protection Program Documents

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BATTELLE
505 King Avenue
Columbus, Ohio 43201

Procedure Status:

[X] Non-Critical Procedure
[ ] Critical Procedure - Procedure Qualification Packet (PQP) Required

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REVISION RECORD INDICATING
LATEST DOCUMENT REVISION

Title Control of Revisions to Radiation Protection Program Documents No. HP-AP-36.0

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Issued By	RB

PROCEDURE APPROVAL PAGE

Prepared By:

C. E. Jensen — 17 December 1998
Date

This procedure, **HP-AP-36.0, Control of Revisions to Radiation Protection Program Documents**, has been reviewed and approved by the following:

S. J. Layendecker — 12/17/98
Date
Safety, Health and Environmental Support Manager

M. E. Jackson — 12/17/98
Date
Regulatory Compliance, Environmental, Safety, and Health Oversight Manager

L. Ermold — 12/17/98
Date
BCLDP Operations Manager

For G. H. Eriksen — 12/17/98
Date
Quality Manager

CONTROL OF REVISIONS TO RADIATION PROTECTION PROGRAM (RPP) DOCUMENTS

1.0 Scope

This document applies to the review of revisions to RPP documents used for Decontamination and Decommissioning (D&D) Operations. See Section 3.3 for a definition of "RPP Documents."

2.0 Purpose

The purpose of this procedure is to provide a review of revisions to RPP Documents to assure that there has not been a reduction of the radiological protection afforded D&D activities as a result of the revision. This review also assures that the revision does not violate or invalidate previously agreed to regulations, agreements, or commitments. This procedure is written in response to a request from the Nuclear Regulatory Commission Region III (NRC) to conduct reviews on the D&D Program RPP Documents similar to those required in Reference 3.2.1.

3.0 References, Developmental Resources, and Definitions

3.1 References

3.1.1 QD-AP-6.1, Documents Control

3.2 Developmental Resources

3.2.1 10CFR50.59, Changes, tests, and experiments

3.3 Definitions

3.3.1 Radiation Protection Program (RPP) Document - Those procedures, plans, and technical basis documents which define the RPP for D&D activities. This includes, but is not limited to, all HP-AP-XX, HP-OP-XX, EM-SP-XX (radiological topics only), EP-IP-XX (radiological topics only), RS-AP-XX, RS-OP-XX, TD-AP-04.0, and TD-AP-05.0.

4.0 General

The intent of this procedure is to help ensure maintenance of the radiological safety margin of the BCLDP Radiation Protection Program through its implementing plans and procedures. The BCLDP document revision review will adopt the evaluation process in the general form of one used in the commercial nuclear power industry (10CFR50.59). The principal test used is an evaluation whether the proposed change results in a decrease in the radiological safety envelope relative to the radiological risks of the project.

5.0 Responsibilities

5.1 Procedure authors are responsible to designate reviewers to implement this procedure, and provide the DDO-341 form as part of the review and comment process for RPP Documents.

5.2 Reviewers designated to perform the review required by this procedure are to perform the review in accordance with this procedure, document their review on Form DDO-341, obtain the concurrence of the Radiological Safety Officer (RSO), and return the completed DDO-341 to the requesting author.

5.3 The RSO either concurs with the review results done by the designated reviewer or directs actions to allow concurrence with the results documented on DDO-341.

6.0 Procedure

6.1 Procedure Revision

6.1.1 Procedure authors prepare Review and Comment packages for procedure revisions in accordance with Reference 3.1.1.

6.1.2 For RPP Documents, a review in accordance with this procedure is required.

6.1.3 Procedure authors designate the reviewer for this procedure by writing "HP-AP-36.0 Review" on the DDO-192 form under "Organization" and naming the reviewer. For this reviewer only, provide a blank Form DDO-341 in the package sent out.

6.2 Procedure Retirement

6.2.1 Responsible managers and/or authors who retire RPP Documents are responsible for distributing the DDO-341 to the designated reviewer and attaching the completed DDO-341 to the DDO-188 or procedure retirement memo in accordance with Reference 3.1.1.

6.3 Field Changes/Waivers

6.3.1 Authors are responsible for distributing the DDO-341 to the designated reviewer and attaching the completed DDO-341 to the DDO-398 in accordance with Reference 3.1.1.

6.4 Conduct of Review

6.4.1 The designated reviewer analyzes the revised portions of the subject procedure and answers the review questions on the DDO-341 by checking "yes" or "no" to the questions. The reviewer signs and dates the DDO-341, and presents it to the RSO for concurrence.

6.4.2 The RSO either concurs in the results of the review as done by the designated reviewer by signing and dating the DDO-341, or if disagreement exists as to review results, initiates steps to:

- Change the document revision to allow for a new review result.
- Change the review result to allow for concurrence.

Once concurrence is reached, the RSO will signify this by signing and dating the DDO-341.

NOTE: If any of the questions on the DDO-341 are answered "yes," the RSO is responsible for providing direction/comments and arranging

for any reviews, approvals, or submittals of the revised document as needed (e.g., RSC, NRC). In certain cases, procedure revisions will be denied by the RSO to prevent degradation of the radiation protection program.

6.4.3 Once the DDO-341 is competed, the designated reviewer returns the completed form to the requesting author.

6.5 Comment Package Disposition

6.5.1 The procedure author includes the completed DDO-341 in the review and comment package (with the DDO-340s, DDO-192, and any other required documentation) and forwards it to Document Control in accordance with Reference 3.1.1.

7.0 Records

7.1 Project records resulting from implementation of this procedure are presented below. Document authors and their manager shall assure timely transmittal of all records to Project Records.

7.1.1 Completed DDO-341 forms

NOTE: DDO-341 should not be sent to Project Records/Document Control as stand alone documents. They should be included as part of review and comment packages, procedure/plan retirement packages, or Field Change/Waiver packages.

8.0 Forms

8.1 DDO-188, Procedure/Plan Assessment Form (see Reference 3.1.1)

8.2 DDO-192, Review Assignment Form (see Reference 3.1.1)

8.3 DDO-340, Review and Comment Form (see Reference 3.1.1)

8.4 DDO-341, Review of Revisions to Radiation Protection Program Documents

8.5 DDO-398, Approval Form Procedure Change (see Reference 3.1.1)

CONTROL OF REVISIONS TO RADIATION PROTECTION PROGRAM (RPP) DOCUMENTS

To: (Author) _____ **Date:** _____

From: (Reviewer) _____ **Requested Completion Date:** _____

Document No., Revision No.:	**Document Title:**

	NO	YES
1. Does the proposed revision constitute a reduction in the radiation safety of the radiation protection program versus the previous revision?	☐	☐
2. Does the proposed revision require a change to the Decommissioning Plan, NRC license, regulatory submittals, Environmental Assessment, or the BCLDP Radiation Protection Plan?	☐	☐
3. Does the proposed revision increase the likelihood or consequence of radiological occurrences/events?	☐	☐
4. Does the proposed revision allow for a less conservative radiological release limit or a radiation dose limit than those described in the previous procedure revision, Decommissioning Plan, NRC license, regulatory submittals, Environmental Assessment, or the BCLDP Radiation Protection Plan?	☐	☐

Resolution/Comments

NOTE: A "YES" answer to any of the above questions also requires RSO approval of the revision and may require the concurrence of the Battelle Radiation Safety Committee or the NRC.

Description of resolution/comments/further actions

_____

_____

_____

_____

Reviewer	Date	Radiological Safety Officer	Date

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QD-AP-6.1
Revision 10

DECONTAMINATION AND DECOMMISSIONING OPERATIONS (DDO)

QUALITY DEPARTMENT ADMINISTRATIVE PROCEDURE (QD-AP)

DOCUMENT CONTROL

BATTELLE
505 King Avenue
Columbus, Ohio 43201

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Procedure Status:

[X] Non-Critical Procedure

[ ] Critical Procedure - Procedure Qualification Packet (PQP) Required

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REVISION RECORD INDICATING
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Title Document Control No. QD-AP-6.1

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Issued By	RB

PROCEDURE APPROVAL PAGE

Prepared By:

Ruth Baruth — 12-17-98

Ruth Baruth, Document Control Manager — *Date*

This procedure, QD-AP-6.1 entitled *Document Control*, has been reviewed and approved by the following.

Approved By:

Dave B. Roe for S. Layendecker — 12/17/98

S. J. Layendecker, Safety, Health and Environmental Support Manager — *Date*

Mark E Jackson — 12/17/98

M. E. Jackson, Regulatory Compliance, Environmental, Safety, and Health Oversight Manager — *Date*

for — 12/17/98

L. F. Ermold, Decontamination & Decommissioning Operations Program Manager — *Date*

for — 12/18/98

G. H. Eriksen, Quality Manager — *Date*

DOCUMENT CONTROL

1.0 Scope

This document applies to the review, approval, distribution, and control of all Battelle Columbus Laboratories Decommissioning Project (BCLDP) documents that prescribe activities affecting the quality of the Decontamination and Decommissioning Operations (DDO) program. This includes documents that establish policies, prescribe or plan operations, and specify work requirements or methods.

2.0 Purpose

The purpose of this procedure is to establish consistent requirements and methods for the review, approval, distribution, and control of documents that prescribe activities affecting the quality of the DDO program. This procedure, in conjunction with Reference 3.1.1, implements the requirements of the DDO Quality Manual, Section 6.0 (Reference 3.1.2).

3.0 References and Definitions

3.1 References

3.1.1 QD-AP-5.1, Preparation of Procedures

3.1.2 DDO Quality Manual

3.1.3 DD-92-04, Readiness Reviews

3.1.4 DOE 5700.6C, Quality Assurance

3.1.5 TD-AP-3.0, Qualification for Critical Procedures

3.1.6 QD-AP-15.1, Nonconformance Reporting for Activities, Items and Materials

3.1.7 HP-AP-36.0, Review of Revisions to Radiation Protection Program Documents

3.2 Definitions

Per Reference 3.1.4, documents to be controlled include drawings, data files, computer codes, procedures, work instructions, data sheets, and other items. Within BCLDP, all quality documents of this type are handled in a "controlled" manner. However, signature sheets are only required for Controlled Documents as defined below.

3.2.1 Controlled Document - A document describing, defining, specifying, reporting, or certifying the quality of an activity, item, or service. The preparation, issue, distribution, and use of Controlled Documents are subject to specified requirements,

reviews, and approvals. A signed receipt for a specifically numbered copy is required from the recipient to verify possession.

3.2.2 Critical Procedure - Procedures whose incorrect performance would pose an immediate or direct threat or danger to D&D workers or members of the general public. Reference 3.1.3 lists the criteria which, when met, constitute a critical action.

3.2.3 Deviation - A planned or unplanned departure from specified requirements. A deviation may be a characteristic outside specifications or failure to follow accepted, documented procedures. Frequently, planned deviations are permitted when written authorization, e.g., a waiver or emergency change is obtained prior to the planned departure from specified requirements. Unplanned deviations are handled as deficiencies and nonconformances.

3.2.4 Document - Any written or pictorial information describing or defining activities, requirements, procedures, and plans or reporting of results.

3.2.5 Field Change - Changes made to a document without entering the revision process. Signatures of the responsible manager, RC&ESHO Manager or designee, Quality representative, and Safety, Health and Environmental Support Manager or designee (as appropriate for safety requirements) are required. Field changes expire when the next revision of the document occurs.

3.2.6 Official - For this procedure, the term applies to an assigned copy of a Controlled Document, e.g., an individual procedure from a controlled manual.

3.2.7 Procedure Qualification Packet (PQP) - A package for critical procedure qualification which includes instructions, prerequisite information, a performance checklist, and a set of questions. The manager or qualifier uses this packet to test a candidate's knowledge of the critical procedure and his ability to perform the procedure to the standards and criteria presented in the PQP.

3.2.8 Registered Document - A document requiring reviews and approvals prior to issue, and a documented distribution and issuance. No signature receipt is required for a Registered Document and documents are not individually numbered. Revisions shall be issued to the registered recipients of the documents when the previous revision is rescinded.

3.2.9 Responsible Manager - The line manager with one-over-one approval authority who supervises the staff member assigned as the author of procedures and their revisions.

As used in this procedure, the responsible manager is the individual responsible for a set of defined organizational functions and, as the functional supervisor of subject matter experts, should normally be accountable for preparing and maintaining implementing procedures associated with that set of functions.

3.2.10 Uncontrolled - For this procedure, the term applies to an unassigned, unregistered copy of a Controlled Document.

3.2.11 Waiver - Documented authorization to deviate from specified requirements prior to commencement of the subject activity. This may cover an entire procedure or any portion thereof, and apply to a single activity or multiple operations. Waivers cannot add requirements or operations. Mandatory signatures shall include the responsible manager, RC&ESHO Manager, Safety, Health and Environmental Support Manager (as appropriate for safety requirements), and the Quality representative prior to the starting of the activity. Length of effect for waivers must be stated.

3.2.12 Radiation Protection Program (RPP) Document - Those procedures, plans, and technical basis documents which define the RPP for D&D activities. This includes, but is not limited to, all HP-AP-XX, HP-OP-XX, EM-SP-XX (radiological topics only), EP-IP-XX (radiological topics only), RS-AP-XX, RS-OP-XX, TD-AP-04.0, and TD-AP-05.0.

4.0 General

4.1 Documents issued for review shall be on white paper and marked "Draft" on each page. After all review comments have been addressed, the procedure shall be issued on white paper for final approval with the "Draft" designation removed.

4.2 The document generation and review process should be planned to allow for a reasonable amount of time for reviewers to review documents. In general, ten working days should be the allowable time period required for document reviews. When necessary to achieve urgent project milestones, five working days is the minimum review time to be allowed. This minimum time should not be abused, however, to make up for lost time (by the author or others).

4.3 Documents will be assumed to have approval from reviewers who have not responded by the stated due date. Late comments will be reviewed for importance and may be held for the next document revision. Comments to be considered for dispositioning, but not needing subsequent

resolution, may be denoted by the reviewer signing and dating both the Reviewer and Comment Resolution Complete spaces provided on Form DDO-340.

4.4 Governing procedures must be present at work sites where corresponding activities are being performed. For the purpose of this procedure, this means governing procedures must be present within the work site building or in an immediately adjacent building. For example, work crews in Buildings 2 or 3 could work to procedure documents present in Building 3. However, it would not be acceptable for a work crew in Building 7 to indicate their governing procedures are in Building 3. In all cases, workers must be able to demonstrate to their supervisor they are fully knowledgeable of the procedure requirements governing their activities.

4.5 Procedures shall be designated as critical or non-critical on the cover of the procedure. The responsible manager concurs with this designation by signing and dating the approval page of the procedure.

4.6 As a condition for issue, procedures and plans submitted to Document Control must be accompanied by the review and comment package and software copies of the text and any new/revised forms.

4.7 Document Control shall maintain a central repository for the most current version of document texts and forms. Software copies of a document to be revised should be obtained from this file by the authorized individuals (authors, secretaries, and managers). However, Document Control retains the right to question the reason for software copy requests and may require additional confirmation of need and/or approvals. Persons using software copies other than those from Document Control do so at their own risk since they may not contain the most current version of the document text or form(s).

5.0 Responsibilities

5.1 Responsible managers are responsible for the preparation of procedures and plans for their functional activities. The authors and their managers designate the critical procedures used in their functional areas and review completed PQPs for accuracy before forwarding them to the Training Manager. The authors and their managers are also responsible for assuring that all review comments have been documented, dispositioned, and resolved. When agreement cannot be reached, successive levels of management must be involved until resolution is achieved.

5.2 Procedure authors designate the procedure as non-critical or critical, with documented concurrence from the responsible manager. Procedure authors, either individually or with assistance by the training staff, prepare PQPs for each critical procedure and may conduct the training and qualify staff in accordance with Reference 3.1.5.

5.3 The Quality Manager is responsible for the preparation of Quality Department Administrative Procedures (QD-AP) and the Quality Manual.

5.4 The Project Records Manager is responsible for administering the Document Control System and shall fulfill the responsibilities of Document Control Manager.

5.5 Reviewers are responsible for performing thorough reviews of documents, documenting comments on Review and Comment Form DDO-340, providing written corrections or changes as needed, and resolving comments (if requested) with the document author or designee.

5.6 The approval signature of the Safety, Health and Environmental Support Manager certifies that a procedure or its subsequent changes have been reviewed to ensure that safety and health controls have not been lessened or degraded by implementation of the procedure or change.

5.7 Individuals using procedures and forms are responsible for insuring the procedures and forms are current and correct.

5.8 Authors of RPP Documents (see Section 3.2.12 of this procedure) are responsible for designating reviewers and obtaining review results in accordance with Reference 3.1.7.

6.0 Procedure

6.1 Document Review and Approval

6.1.1 Quality Manual

6.1.1.1 The Quality Manager shall prepare or revise the Quality Manual to satisfy contractual requirements for quality.

6.1.1.2 The Quality Manager shall distribute draft copies of the Quality Manual for review to the BCLDP Operations Manager and all DDO managers reporting to the Operations Manager. Forms DDO-340 and DDO-192 will be attached to each document distributed for review. Additional reviewers may be designated by the Quality Manager.

6.1.1.3 Reviewers shall return completed Review and Comment forms to the Quality Manager who shall disposition the comments (see Sections 5.2 and 6.1.2.4 of this procedure), complete the resolution by acquiring

appropriate signatures on the review forms, and revise the draft Quality Manual to contain the resolved changes.

6.1.1.4 The BCLDP Operations Manager and Quality Manager shall sign approval on the heading of each section of the Quality Manual. Additionally, the Battelle Columbus Operations Vice President for Environment, Safety, Health, & Quality shall sign approval of the Quality Manual Policy Statement. After all signatures have been obtained, the Quality Manager shall forward the Quality Manual to the Document Control Manager for issue along with the review and comment package and software copies of the text and any new/revised forms, if any.

6.1.1.5 The Document Control Manager shall issue the Quality Manual as a Controlled Document according to a distribution list provided by the Quality Manager.

6.1.2 DDO Administrative, Quality, and Operating Procedures

6.1.2.1 The responsible manager shall prepare or assign a designee to prepare the procedure following the format and requirements of Reference 3.1.1.

6.1.2.2 The responsible manager/designee shall distribute the draft procedure with Forms DDO-340 and DDO-192 for review to the Regulatory Compliance & Environment, Health and Safety Oversight (RCESHO) Manager; the Safety, Health and Environment Support Manager; a technical reviewer, preferably with experience in the subject activity; the Quality Manager; and all DDO managers whose organizations may be impacted by activities addressed in the document. For RPP Documents (see Section 3.2.12 of this procedure), in addition to the above required reviewers, a review in accordance with Reference 3.1.7 is also required. The designation "HP-AP-36.0 reviewer" will be included on the DDO-192 list of reviewers and a DDO-341 form, "Review of Revisions to RPP Document," will be distributed to the assigned HP-AP-36.0 reviewer. Additional reviewers may also be selected. Responsible managers may assign the review to a delegated individual(s) by filling in the bottom of Form DDO-192. Where the review has been delegated to more than one individual, the responsible manager will integrate all comments to assure that no contradictory

comments from the same organization are submitted to the document author.

6.1.2.3 All reviewers shall review the procedure using guidelines in Exhibit 1 as applied to their areas of expertise and responsibility. HP-AP-36.0 reviewers will follow the guidelines set forth in that procedure. The responsible manager shall make sure reviewers are aware of these guidelines.

6.1.2.4 All reviewers shall record their comments or corrections on the Review and Comment Form DDO-340 (or DDO-341) and return it with Form DDO-192 to the responsible manager/designee for resolution. Reviewers shall identify on the Review and Comment forms the pages, sections, paragraphs and lines being commented on, indicate whether the comment does or does not require formal resolution by following the signature directions at the bottom of the DDO-340 form, and when applicable provide an acceptable alternative for the commented text of the document. The Review and Comment and Review Assignment forms (DDO-340 and DDO-192) shall then be returned to the responsible manager/designee by the stated due date.

6.1.2.5 The responsible manager/designee of the procedure shall make changes deemed appropriate, disposition comments made on the Review and Comment forms, and complete the resolution by acquiring signatures of the reviewer and responsible manager/designee on the Form DDO-340 if required (see Sections 5.2 and 6.1.2.4 of this procedure). The draft procedure shall be revised to contain the resolved changes to the text.

6.1.2.6 The responsible manager/designee shall return the final document to the responsible manager; Safety, Health and Environmental Support Manager; Regulatory Compliance, Environmental, Safety, and Health Oversight (RCESHO) Manager; and Quality Manager for signature on the Procedure/Plan Approval Page. For Administrative, Quality, and any other policy stating procedure, the BCLDP Operations Manager shall also be an approver. These are the minimum approvers and other approval signatures may be added at the discretion of the responsible manager.

6.1.2.7 The responsible manager/designee shall forward the procedure to the Document Control Manager along with the review and comment package and software copies of the text and any new/revised forms.

6.1.2.8 The Document Control Manager shall initial and date the Current Revision block located in lower right corner of the Document Revision Record Page (DDO-009) prior to distribution. This date is the issue date (the date on which the document becomes effective but is generally not the distribution date)..

6.1.3 Technical and Administrative Plans (Work Plans, Quality Plans, Characterization Plans, D&D Plans, or any other plan specifying technical or administrative activities)

6.1.3.1 The individual responsible for the activity, or a designee, shall obtain a document number from the Document Control Manager and initiate preparation of the associated plan using whatever format is required or deemed appropriate.

6.1.3.2 The review process as delineated in Sections 6.1.2.2 through 6.1.2.5 of this procedure shall be followed. Plan approvals should be in accordance with Section 6.1.2.6, as deemed appropriate by the responsible manager. The plan shall be forwarded and issued as outlined in Sections 6.1.2.7 and 6.1.2.8 of this procedure.

6.2 Document Registration, Control, and Issue

6.2.1 Controlled Documents

6.2.1.1 Documents issued as Controlled, such as the Quality Manual, Health Physics Procedure Manual, and other controlled manuals designated by the responsible manager, shall be identified by a completed and signed Controlled Document Transmittal Record (Form DDO-191).

6.2.1.2 The document author and responsible manager shall prepare the distribution list for individuals to be recipients of Controlled Documents after consultation with the Document Control Manager. At a minimum, all organizations impacted by a document shall be represented on distribution lists.

6.2.1.3 All controlled manuals shall be numbered consecutively and each assigned to an individual by the Document Control Manager. A copy of the numbered document, and a correspondingly numbered Form DDO-191, shall be delivered or sent to each individual on the distribution list. The Form DDO-191 shall also be used to distribute revisions and supplements to the individuals on the distribution list.

6.2.1.4 The document will be considered Controlled by return of the signed Form DDO-191 to the Document Control Manager.

6.2.1.5 The Document Control Manager shall maintain a record file of all Controlled Document receipts and distribute any revisions as Controlled Documents to the recipients of the initial Controlled Document, with instructions to destroy or void the preceding revision.

6.2.2 Registered Documents

6.2.2.1 Documents to be issued as Registered shall be forwarded to the Document Control Manager for distribution at the completion of the required review and approval process.

6.2.2.2 The document author and responsible manager, upon consultation with the Document Control Manager, shall formulate the distribution list for Registered Documents. At a minimum, all organizations impacted by a document shall be represented on distribution lists.

6.2.2.3 The staff member distributing the document shall initial and date the distribution list (Form DDO-200) attached to the document "original", thus registering the completion of the distribution.

6.2.2.4 The document "original" file copy and registered distribution shall be filed and maintained as a record by the Document Control Manager.

6.2.2.5 Instructions for revisions to Registered Documents shall be sent to recipients of the initial Registered Document as specified in Section 6.3 of this procedure.

6.2.3 Delinquency Document

When custodians or others are delinquent in returning signature sheets (Form DDO-191) or other documents, the Document Control Manager should use Form DDO-201, Document Delinquency Notice, to remind them of their delinquency.

6.3 Controlled or Registered Document Revisions

6.3.1 **Minor** document revisions should conform to the format of the most recent revision of that document. Examples of minor revisions include changes to correct grammatical or typographical errors and limited changes which do not significantly alter the document content, scope or purpose.

6.3.2 **Minor** revisions shall require approval by the responsible manager and the Quality Manager. Depending on the nature of the change, other approvals may be required as deemed necessary by the responsible manager and/or the Quality Manager.

6.3.3 **Minor** revisions require a document revision number change. The number after the decimal point must be increased sequentially with each minor revision change e.g., Revision 2 to Revision 2.1. For minor revisions, substitution of only the individually revised pages is obligatory. There is no limit to the number of minor revisions allowed prior to a major revision.

6.3.4 **Major** revisions including major document format changes or changes which significantly alter the content or purpose of the document shall be reviewed and approved by the same process used for the initial review/approval of the document. A major revision requires that the number to the left of the decimal point be increased sequentially to the next whole number (e.g., Revision 2.1 to Revision 3) and replacement of the entire document upon review and approval.

6.3.5 All revisions or changes must be identified on the page with a vertical bar in the margin adjacent to the line or lines in which the corrections were made or by other methods which highlight the changes. The revision number must also be documented in the appropriate box(es) on the Revision Record Indicating Latest Document Revision (Form DDO-009) located as one of the front pages in each document.

6.3.6 Registration or control of a revised document shall follow the same process as the original document. Revision distribution shall be made to all individuals identified as recipients of the current Controlled Document (Form DDO-191) or Registered Document (Form DDO-200). Recipients shall replace the entire document (for major revisions) or the revised pages (for minor revisions) in order to keep their controlled or registered documents current. Record copies of revised procedures will be marked "superseded."

6.4 Usage, Field Change, and Waivers of Controlled and Registered Documents

6.4.1 Controlled Documents

6.4.1.1 Documents issued as Controlled, will be distributed to specific custodians at locations throughout the work areas. This will ensure that DDO staff have immediate access to the correct and current procedures, plans, manuals, etc.

6.4.1.2 Documents with the words "Controlled Copy" shall be the only copies at the work site. They may include the entire manual or "Official" copies of procedures from controlled manuals. Official copies shall indicate the control copy number, the custodian's (issuee) signature, and the date issued on the cover page. Custodians should maintain lists of those official copies issued. Upon receipt of a revision, the custodian will issue new official copies to the staff on the list and retrieve and dispose of the outdated copies. This will ensure that current revisions of all controlled documents are being used.

6.4.1.3 Controlled Documents cannot be reproduced without approval of the custodian or issuee. Documents that are reproduced for other than use involving work activities will be stamped or marked "Uncontrolled Copy" and may be used as outlined in Section 6.4.2.

6.4.1.4 A document marked "Field Change" will consist of all changes (including marked up pages of a procedure, plan, or drawing) not in the latest revision of the pertinent controlled document. The field changes shall be attached to a Form DDO-398 which contains the approval signatures of the designated managers. Field changes for RPP Documents must be reviewed in accordance with Reference 3.1.7 and DDO-341 form completed and attached to the DDO-398 to form a complete package.

6.4.1.5 The original copy of the approved field change shall be submitted to Document Control with any supporting information and copies must be present at all work stations where the subject document is being implemented. Document Control will maintain a log of field changes in force. Changes or deviations can also be documented on a Nonconformance Report (NCR), Form DDO-177 (see Reference 3.1.6).

6.4.1.6 A waiver to a Controlled Document authorizes a deviation from the specified requirements and is attached to a Form DDO-398 showing the signatures of the designated managers prior to the commencement of the activity. Waivers to RPP Documents must be reviewed in accordance with Reference 3.1.7 and a DDO-341 form completed and attached to the DDO-398 to form a complete package. Waivers are distributed as in Section 6.4.1.5.

6.4.1.7 An official copy of a Controlled Document may be used when entering a contaminated area. This copy will be marked "Contaminated Area Work Copy" and will be disposed of with the radioactive waste at the completion of the task.

6.4.1.8 If a Controlled Document requires replacement because of wear and tear, the custodian shall call the Document Control Manager to request a replacement. The custodian shall specify the specific document with assigned copy number. Upon receipt of the document, the custodian shall sign Form DDO-191, Controlled Document Transmittal Record, and return it to the Document Control Manager.

6.4.2 Uncontrolled Documents

6.4.2.1 Copies of Uncontrolled Documents shall be marked or stamped "Uncontrolled Copy" and used for information only.

6.4.2.2 These copies shall NOT be used in the field to guide work activities. They may be used for training, personal information, or other "Information Only" activities.

6.4.2.3 Copies of Uncontrolled Documents may be made from "Controlled Copies" with the custodians knowledge, or may be obtained from Document Control. They shall be marked or stamped appropriately (see Section 6.4.2.1 of this procedure).

6.4.2.4 Revisions of Controlled Documents shall not be issued to holders of Official or Uncontrolled Document copies.

6.4.3 Registered Documents

6.4.3.1 Documents issued as "Registered" shall include plans, and operating and administrative procedures with a separate distribution list from the Controlled Documents.

6.4.3.2 Document users and task managers have the ultimate responsibility of having the correct and current revision (per Procedure Index) at the work site.

6.4.3.3 A document stamped "Field Change" will consist of all changes not available in the latest revision, including marked up pages of a procedure, plan, or drawing where the appropriate approval signatures have been obtained as in Section 6.4.1.4.

6.4.3.4 A waiver to a "Registered" document becomes effective when the signatures of the designated managers have been obtained as in Section 6.4.1.6.

6.4.4 Advance Copies

6.4.4.1 Procedures may be issued as Advance Copies prior to completion of the normal review cycle (see Reference 3.1.1).

6.4.4.2 As a minimum, Advance Copies require the approval of the responsible manager, SH&ES Manager, and the Quality Manager.

6.4.4.3 Advance Copies will carry the next revision level followed by the letter "A" and be issued on white paper with the "ADVANCE COPY" notation displayed on each page.

6.4.4.4 Advance Copies are valid for 60 days, and may be extended for an additional 30 days with the written approval of the Quality Manager.

6.4.4.5 At the conclusion of the review and comment cycle, the Advance Copy will be replaced by a normally issued copy.

a. If NO comments were incorporated into the final version, the final version will drop the "A" from the revision number and be issued with the same revision number as the Advance Copy on white paper (Advance Copy revision "2A" would be issued as final version revision "2").

b. If ANY comments are incorporated into the final version, the final version will go to the next numerical revision number and be issued

on white paper. (Advance Copy revision "2A" would be issued as final version revision "3").

6.5 Procedure Retirement

6.5.1 A procedure may be retired as a result of a biennial assessment or at any other time when justified and documented by the responsible manager. The request may be documented on either the DDO-188 "Procedure/Plan Assessment Form," or in a memo. An example of a retirement request memo is shown in Exhibit 2.

6.5.2 The request must receive the concurrence of the RC&ESHO Manager, SH&ES Manager, and Quality Manager as documented on the request memo. Failure to obtain a concurrence shall be escalated to the next level of management for resolution.

6.5.3 Retirement of RPP Documents must be reviewed in accordance with Reference 3.1.7 and a DDO-341 form completed and attached to the DDO-188 or retirement memo to form a complete package.

6.5.4 The Document Control Manager will notify the Training Department and all holders of a procedure that the document has been retired and to destroy or void the procedure. Record copies will be marked canceled and moved to a retired procedures file. The retired procedure will also be removed from the procedures' index.

6.5.5 The same process shall be used to retire out-of-date plans after the subject activity has been completed.

6.6 Biennial Assessment of Technical Procedures and Plans

6.6.1 Technical procedures and plans shall have a documented assessment of their conformance to current requirements and work practices and utility for continued support of activities.

6.6.2 They shall be reviewed every two years based on the current issue or last major revision date (see Paragraph 6.3.4) to assess them for continued use as is, revision, or retirement.

6.6.3 This assessment shall be conducted by the section manager (or designee) responsible for the procedure or plan.

6.6.4 The assessment shall be documented using Form DDO-188.

6.6.5 The procedure index database shall be used to track the dates for biennial assessments of procedures and plans.

6.6.6 The Document Control Manager shall send a Form DDO-188 with a copy of the procedure or plan attached to the responsible manager. The response date shall be specified but at least two weeks should be allowed.

6.6.7 The responsible manager or designee shall evaluate the procedure's or plan's current conformance to DDO activities and requirements and its continued utility.

6.6.8 The responsible manager or designee shall complete Form DDO-188 with a statement of his/her intentions (use as is, revise, retire, etc), and sign, date, and return the form to the sender by the date indicated.

6.6.9 Requests to retire a procedure shall follow the process in Section 6.5.

6.6.10 Document revision by the responsible manager or his/her designee shall satisfy the requirements of Section 6.3 of this procedure.

6.6.11 The completed form shall be filed in the permanent procedure folder in the Document Control System.

6.6.12 The Document Control Manager shall take appropriate action based on the findings from the assessment and note them on the bottom of Form DDO-188 and in the procedure assessment data base.

6.7 Document Index

An index listing all active documents and their revisions shall be issued quarterly at a minimum to designated staff and locations by the Document Control Manager. Procedures which have associated PQPs shall be marked with a symbol (#) on the DDO Procedures Index. Included in this index will be an identification of the section manager or designee responsible for each listed document. The index shall be updated by the periodic issuance of a supplement listing documents issued and retired during the defined period. A procedures index is also available from the computer network and is updated on a routine basis.

6.8 Forms Management

6.8.1 Forms referenced in a procedure are an integral part of the procedure and as such, shall be appended to draft and final procedures for reference purposes. All DDO forms shall be traceable to at least one active DDO procedure, manual, plan, etc.

6.8.2 An index listing for all active forms and their revisions is maintained and issued quarterly at a minimum by the Document Control Manager. The forms index is also available on the computer network and is updated on a routine basis. Forms users are

responsible for consulting the latest issued forms index and assuring that they are using the most current revision.

6.8.3 Form numbers for new forms shall be obtained from the Document Control Manager or his/her designate and, when finalized, a software disk copy shall be provided to the Document Control Manager for file and distribution at the time of procedure issue.

6.8.4 Revision of forms shall be accomplished under the authority of the manager responsible for the related procedure. Form revision outside of procedure revision should be approved by the responsible manager with the date. After the revisions are complete, a computer software disk copy shall be provided to the Document Control Manager for file and distribution upon request.

6.8.5 Identification of items to be entered on a summary-type data form (e.g., DDO-103) may be listed without changing the form revision number. However, a disclaimer indicating the dedicated use of the form shall appear as shown in Exhibit 3.

6.8.6 When conducting the biennial assessment of technical procedures, the staff member performing the assessment shall assure that the forms referenced in, and appended to the procedure are the most current versions and that the forms are consistent with the contents of the procedure and vice versa.

6.8.7 A supply of current forms used on a routine basis shall be available at designated locations within Program office work areas.

7.0 Records

7.1 Project records resulting from the implementation of this procedure are presented below. Document authors and their manager shall assure timely transmittal of all appropriate documents to Document Control.

7.1.1 Approved copies of Controlled Documents

7.1.2 Approved copies of Registered Documents

7.1.3 Signed Document Control receipts

7.1.4 Initialed Registered Document distribution list

7.1.5 Completed Review and Comment Forms

7.1.6 Completed Procedure Assessment Forms

7.1.7 Completed Review Assignment Forms

7.1.8 Field Changes and Waivers

7.1.9 Document Delinquency Notices

7.1.10 Document Distribution Memos

7.1.11 Completed Review of Revisions to RPP Documents Form

8.0 Exhibits, Forms, and Attachments

8.1 Exhibits

8.1.1 Exhibit 1, Document Review Guidelines

8.1.2 Exhibit 2, Example of Memo to Request Procedure or Plan Retirement

8.1.3 Exhibit 3, Example of Disclaimer for a Dedicated Data Form

8.2 Forms

8.2.1 DDO-009, Revision Record Indicating Latest Document Revision

8.2.2 DDO-177, Nonconformance Report (see Reference 3.1.6)

8.2.3 DDO-188, Procedure Assessment Form

8.2.4 DDO-191, Controlled Document Transmittal Record

8.2.5 DDO-192, Review Assignment Form

8.2.6 DDO-200, Document Registration-Procedure Distribution

8.2.7 DDO-201, Document Delinquency Notice

8.2.8 DDO-340, Review and Comment Form

8.2.9 DDO-341, Review of Revisions to RPP Documents (see Reference 3.1.7)

8.2.10 DDO-398, Approval Form Procedure Change

8.3 Attachments

None

EXHIBIT 1

DOCUMENT REVIEW GUIDELINES

1. Purpose and scope are clearly defined.

2. Does not contradict other procedural or plan requirements.

3. Provides clear and logical process for satisfying purpose/requirement.

4. Responsibilities are clearly identified where appropriate.

5. Presents a realistic approach for performing the activity.

6. If use of another document is required, it is identified.

7. Requirements and methods of performing each activity are defined to an appropriate degree.

8. Where practicable, features which will allow measurement of compliance are incorporated.

9. Specifies change control, if applicable.

10. Data and associated data forms specified as appropriate.

11. Special training requirements specified, if applicable.

12. Interfaces between organizations and documents are appropriately described.

13. All applicable radiological, industrial health and safety, etc., requirements are addressed and the requirements identified if appropriate.

14. Compliance methods for all applicable DOE orders, NRC, etc., requirements are included and requirement reference identified.

15. All applicable OSHA standards, industry standards, etc., are addressed for compliance and the requirement reference identified.

16. All applicable local, state, and federal codes are addressed for compliance and the requirement reference identified.

EXHIBIT 2

EXAMPLE OF MEMO TO REQUEST PROCEDURE OR PLAN RETIREMENT

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Project Number _____

Internal Distribution

Date

To Document Control Manager

From *(Responsible Manager, Title)*

Subject Request to Retire *(Provide Plan/Procedure Identifier)*

I have reviewed *(provide plan/procedure title)* and request that it be retired for the following reasons(s):

Concurrence:

_____
RC&ESHO Manager

_____
Quality Manager

_____
SH&ES Manager

EXHIBIT 3

EXAMPLE OF DISCLAIMER FOR A DEDICATED DATA FORM

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SUMMARY AND/OR SPECIAL REPORT FORM

Building No._____ W.I. No._____ Date_____

Entered by_____ Date_____

Reviewed by_____ Date_____

DISCLAIMER: This modified form is limited to use by (name of group) _____

Personnel: _____

Health Physics: _____

RWP: _____ HPS Surveys: _____

Work Accomplished: _____

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REVISION RECORD INDICATING
LATEST DOCUMENT REVISION

Title _____ No. _____

_____ Page i of ii

INDEX OF PAGE REVISIONS

Page No.	i	ii	iii							
Rev. No.										

Page No.	1	2	3	4	5	6	7	8	9	10
Rev. No.										

Page No.	11	12	13	14	15	16	17	18	19	20
Rev. No.										

Page No.	21	22	23	24	25	26	27	28	29	30
Rev. No.										

Page No.	31	32	33	34	35	36	37	38	39	40
Rev. No.										

REVISION RECORD	
Rev. No.	Date

REVISION RECORD	
Rev. No.	Date

CURRENT REVISION	
Rev. No.	
Issue Date	
Issued By	

NONCONFORMANCE REPORT

NCR No. _____

Nonconformance Item _____ **Date** _____

Originator _____

Description of Nonconformance and Apparent Cause

Recommended Corrective Action and Action to Prevent Recurrence

Nonconformance Review Committee Disposition (if necessary)

Lessons Learned

Nonconformance Review Committee Disposition Approval

_____ Date _____ Date Correction Action Completed _____

_____ Date _____ _____ Date _____
Responsible Manager

_____ Date _____ _____ Date _____
Quality Manager

_____ Date _____

DDO-177, Revision 2 *2/94(rm)*

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PROCEDURE/PLAN ASSESSMENT FORM

Date

To

From BCLDP Document Control

Subject Assessment of Procedures/Plans

PROCEDURE/PLAN _____ AUTHOR _____

The attached procedure/plan is being sent to you for assessment of its content and continued utility. You or your designee should assess the procedure/plan and check the appropriate lines below; please return this form to BCLDP Document Control in Room 11-1-070 by _____.

Please sign and date this form on the lines provided below.

The following is my assessment of this procedure/plan:

_____ I have assessed this procedure and no revisions are needed. Please renew.

_____ Revisions are needed and I will have this done by _____ (*provide an estimate of the date*). Also review PQP for critical procedures.

_____ This procedure/plan should be retired for the reasons presented below:

_____

_____

To retire a document, obtain the following concurrence signatures:

Mark Jackson Date RC&ESHO Manager	Steve Layendecker Date ES&HS Manager	Gordon Eriksen Date Quality Manager

Responsible Manager _____ Date _____
(Signature)

Document Control Manager	Date	Action

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Page ____ of ____

CONTROLLED DOCUMENT TRANSMITTAL RECORD

_____
(Transmittal Date)

_____
(Transmittal No.)

To:		From: BCLDP Document Control JN-1			
Title:				Copy No.	
Number	Item	Remove		Insert	
		Rev.	Date	Rev.	Date

Special Instructions:

PLEASE SIGN BELOW AND RETURN TO SENDER

I hereby acknowledge receipt of the documents transmitted to me by this form. In the case of revisions, I acknowledge their incorporation into the appropriate manual and have destroyed all superseded material or marked superseded copies as such.

Please Sign and Return by _____ _____ _____
(Signature) (Date)

DDO-191 *(8/91)*

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REVIEW ASSIGNMENT FORM

Document Title			
Document ID	Rev. Number	Date Issued for Review	Review Comments Due

The subject document is being submitted for your review and comment. Since this review is controlled, a response is required from all reviewers. Therefore, please return this review sheet with comments on Form DDO-340.

To: Room No. From:

Additional Instructions:

- Please do not mark significant comments on text.
- Only editorial comments may be marked on the document.
- Comments received after mandatory due date may not be incorporated.

Organization	Reviewer	Signature of Actual Reviewer/Date
Quality		
R.C. and ES&H Oversight		
SH&ES		
Others:		

General Review Comments

This review has been delegated as indicated below. By my review signature below, I concur with their comments and they have my full review authority

Reviewer: Name of Delegee: Date:

DDO-192, Rev. 2 8/94(rm)

Project Number ____

Internal Distribution

(see below)

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Date

To Distribution

From Ruth Baruth

Subject Document Registration—Procedure/Plan Distribution

_____ Attached is a new procedure/plan. _____

_____ Attached is a revised procedure/plan. _____
Please discard the previous revision.

_____ Attached are replacement pages for procedure/plan. _____
Pages _____.
Please discard the replaced pages.

_____ Procedure/plan _____ has been retired. Please discard your copy.

_____ Pages for an approved field change of procedure/plan _____.
Keep these pages with your present copy of the procedure. A revision will be issued in the future.

NOTE:
If You Are To Be Qualified On The Above Procedure, Initiate a DDO-085 Form And See Your Supervisor. If You Are Qualified On This Procedure, You Will Receive Notification from The Training Department That You Need to Complete a DDO-085 Form to Qualify On Any New Revisions. It Is Not Normally Necessary to Qualify on Administrative Procedures; Check With Your Supervisor.

DISTRIBUTION

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DOCUMENT DELINQUENCY NOTICE

Date:

To:

From: DDO Records Management

The following documents were sent to you and signature sheets and/or responses have not been returned.

Type of Document*	Document Number or Name	Date of Issue

* Manual, procedure with reading sheet, procedure assessment

cc: QA/DDO Program Manager/Records Management

DDO-201 *(7/91)*

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REVIEW AND COMMENT FORM Page No. of

To: (Author) Date:

From: (Reviewer) Requested Completion Date:

Document No., Revision No.:	Document Title:

Sections of Document to be Reviewed:

Page, Section, Paragraph, and Line Number	Review Comment	Comment Disposition

Reviewer*	Date	Dispositioned By	Date

Comment Resolution Complete

Reviewer*	Date	Author	Date

*Reviewer shall sign both places initially if formal disposition and resolution of comments is not desired.

NOTE: See guidelines for Author's Review and Technical Review on back of this form

DDO-340, Revision 5 *9/94(rm)*

AUTHOR'S REVIEW GUIDELINES

Assure that:

1. The document is within the project scope.
2. The document is legible.
3. The document satisfies contractual and project requirements.
4. The references are satisfactory.
5. Calculations and/or analyses and data are properly overchecked, documented, and traceable for verification.
6. The document is acceptable with no further review or that it is reviewed in greater detail by qualified independent technical reviewers. See Technical Reviewer Guidelines below.

TECHNICAL REVIEW GUIDELINES

Address the following questions:

1. Is the document logically organized?
2. Is the text clearly and concisely written?
3. Is the problem to be solved and assumptions or rational for assumptions clearly stated?
4. Does the document satisfy the project scope/requirements as stated in the planning documents?
5. Does the executive summary/abstract clearly and accurately state the conclusions to promote understanding by a non-technical reader?
6. Are references identified, traceable, available, and accurately quoted or interpreted?
7. Are units specified and correct? Are conclusions from data and/or calculations technically correct and logical?
8. If data are not as logically anticipated or reasonably expected, are stated conclusions technically rational?
9. Are data traceable and have the data been identified and verified?

Add additional items as appropriate when reviewing a specific technical document.

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REVIEW OF REVISIONS TO RADIATION PROTECTION PROGRAM (RPP) DOCUMENTS

To: (Author) _____ **Date:** _____

From: (Reviewer) _____ **Requested Completion Date:** _____

Document No., Revision No.:	**Document Title:**

	NO	YES
1. Does the proposed revision constitute a lessening of the protection factor of the RPP versus the previous revision?	☐	☐
2. Does the proposed revision constitute a lessening or elimination of a commitment to a regulatory requirement versus the previous revision?	☐	☐
3. Does the Proposed revision constitute a less conservative release limit or dose limit?	☐	☐

NOTE: A "YES" answer to any of the above questions requires resolution by the RSO with the NRC.

Reviewer	Date	Radiological Safety Officer	Date

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APPROVAL FORM PROCEDURE CHANGE

Requester _____
(Print name & title)

Procedure No. _____ **Rev. No.** _____

This is an approved procedure change by one of the following methods:

☐ Field Change Effective till _____

☐ Waiver Effective till _____

Approvals:

_____ / _____ _____
Print ***/Sign***
Section Manager *Date*

_____ _____
S. J. Layendecker, *SH&ES Manager* *Date*

_____ _____
M. E. Jackson, *RC&ESHO Manager* *Date*

_____ _____
G. H. Eriksen, *Quality Manager* *Date*