



Department of Energy

Washington, DC 20585

April 8, 2002

MEMORANDUM FOR DISTRIBUTION

FROM:

Jessie Hill Roberson
JESSIE HILL ROBERSON
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT

SUBJECT:

10 CFR 830, Subpart B Implementation

One year has passed since the Environmental Management (EM) contractors informed DOE on 10 CFR 830, Subpart B compliance status of their safety bases. During this period, less than a third of all EM facility safety bases have been approved by DOE as compliant with the Rule or are in the approval process. In the next year, almost 100 Rule-compliant safety bases for the remaining facilities are required to be prepared and submitted for DOE approval.

The April 10, 2003, compliance deadline is not the end point of this process. Subsequent DOE approval and implementation by the contractor of the approved safety bases are essential in deriving the safety benefit and these activities must be considered for their cost and schedules. The key to success is to have early DOE involvement in contractor safety bases preparation and agreement on cost and schedules resulting in high quality safety bases that permit expeditious approval and implementation. To monitor progress against this expectation, please provide the implementation schedule for the safety bases at each of the facilities under your jurisdiction.

To assist in your effort for preparing this information, the existing listing of EM nuclear facilities subject to the Rule is attached and has been electronically provided to the Point of Contact (POC) as identified on the listing. Please update this listing and add the following elements:

- The date by which the safety basis was or will be approved by DOE; identify any unique schedule drivers or considerations.
- The date by which the safety basis was or will be declared as being fully implemented and effective (following any validation as appropriate).
- Identification of any exemptions considered necessary.

By May 15, 2002, please provide a hard copy of this listing under your signature as your approved schedule and have your POC provide an electronic version to Dr. Maria Gavrilas-Guinn, Office of Health, Safety and Security (EM-5).

If an exemption is needed, please ensure that early DOE Field Office and EM-5 involvement occurs and the exemption package is developed in accordance with 10 CFR 820 and DOE-STD-1083-95.

Rule implementation is the current focus of Paul Gubanc's 10 CFR 830 implementation study. As part of this study, several workshops will be conducted to formulate additional EM policy guidance on this or related topics. It is my expectation that each EM site will support and participate in these workshops. I believe the insights you will gain at these workshops will be helpful.

If you have questions, please contact Sandra Johnson, Director, EM-5, at 202-586-0755.

Attachment

Distribution:

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