



## Department of Energy

Washington, DC 20585

March 27, 2001

### MEMORANDUM FOR DISTRIBUTION

FROM: CAROLYN L. HUNTOON  
ASSISTANT SECRETARY FOR  
ENVIRONMENTAL MANAGEMENT

Handwritten signature of Carolyn L. Huntoon in black ink.

SUBJECT: TOOLS TO ASSIST IN THE IMPLEMENTATION OF 10  
CFR 830, SUBPART B, SAFETY BASIS REQUIREMENTS

This memorandum is a follow-up to issues discussed during the training and working sessions successfully held in January 2001, dedicated to implementation of 10 CFR 830, Subpart B, Safety Basis Requirements. Specifically, this memorandum:

- offers the safety basis adequacy and compliance review criteria recommended to be used by Environmental Management (EM) contractors and DOE (Attachment 1);
- describes the content of a contractor's request for DOE approval of an alternate methodology used to prepare the Documented Safety Analysis, if the methodology is different of the corresponding "safe harbor" listed in 10 CFR 830, Appendix A, Table 2 (Attachment 2);
- describes the content of a contractor's request for exemptions from the 10 CFR 830, Subpart B provisions (Attachment 3);
- provides the answers/clarifications, generated by EH-53, to questions related to CFR 830 implementation raised to date by EM contractors and DOE personnel (Attachments 4 and 5);
- requests the present status of the EM facilities and information pertinent to the Rule implementation (Attachment 6) be updated by April 15, 2001 and sent to EM-5. A change in this status is expected based on the present gap analyses carried out at all sites and the April 2001 submittals required by the Rule; and
- Requests that you also provide to EM-5, by April 15, 2001, the Unreviewed Safety Questions procedures received from contractors for DOE approval.



I expect the interaction between all parties involved in safety basis activities to continue in order to ensure timely and cost-effective Rule implementation.

Please contact Mr. Randal Scott, Director, Office of Safety, Health and Security, at (202)586-0755 or Dr. Maria Gavrilas-Guinn at (202)586-2232 (maria.gavrilas-guinn@em.doe.gov), for any questions related to this effort.

#### Attachments

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