Project Justification Statement for New Standard for Reactor DSAs

1. Title: *Preparation of Documented Safety Analysis for DOE Reactors*

The proposed project is to develop a new DOE Standard (STD), *Preparation of Documented Safety Analysis for DOE Reactors*. A Documented Safety Analysis (DSA) is required for each DOE reactor facility in accordance with 10 CFR 830, *Nuclear Safety Management*, Subpart B, *Safety Basis Requirements*. The new standard will be a short, high-level coordinating standard that will describe top-level process and requirements and bring in appropriate consensus and DOE standards where needed to satisfy 10 CFR 830, *Nuclear Reactor Management*, DSA requirements for different and unique reactor facilities.

Table 2 of Appendix A to Subpart B provides a listing of acceptable DSA methodologies (also known as safe harbor methods) for various types of nuclear facilities, including DOE reactor facilities. The existing Table 2 lists the following for DOE reactors:

> *"Using the method in U.S. Nuclear Regulatory Commission Regulatory Guide 1.70, Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants, or successor document."*

The proposed new standard is intended to be available to add another approved option in Table 2 in an upcoming revision to 10 CFR 830. This standard will be developed in accordance with the normal technical standard development process described in DOE Order 252.1A, *Technical Standards Program,* and the associated Technical Standards Program Procedures (TSPPs).

2. Organization Name/Code

Office of Nuclear Safety Basis and Facility Design (AU-31)
Office of Nuclear Safety (AU-30) within the Office of Environment, Health, Safety and Security

3. Author's Name

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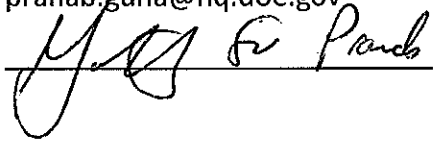
Signature:	

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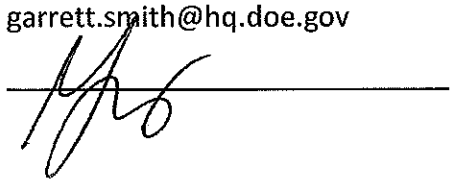
Signature:	

5. How will this new technical standard support the DOE?

The proposed standard will incorporate best practices and lessons learned from developing DSAs for DOE nuclear reactors around the DOE complex since issuance of the rule in 2001. This new standard is intended to support mission success by providing a more clear method to satisfying the 10 CFR 830 DSA requirements. For DOE reactors with an approved DSA based on Reg. Guide 1.70, there will be no requirement or recommendation to move to the new Standard.

6. List possible Voluntary Consensus Standards (VCS) that were considered for use in lieu of developing or revising the subject Standard.

No consensus standard currently exists for providing criteria and acceptable methodology for preparing DSAs for DOE nuclear reactors to fully meet 10 CFR Part 830, Subpart B, requirements. DOE requirements and methods are unique.

7. Provide detailed justification for the PA's decision not to use potentially applicable VCSs in lieu of developing or revising a DOE Technical Standard.

No voluntary consensus standards exist that would meet this need. DOE has unique safety basis requirements in 10 CFR 830, Subpart B; these unique requirements are not addressed in existing voluntary consensus standards.

8. Will this new or proposed revision to the DOE Technical Standard have an effect on any DOE Directives or a Rule?

This standard is being developed with the intent to be available to support a change to Table 2 of Appendix A of Subpart B to 10 CFR 830. However, after appropriate reviews, users may be able to use the new standard as an approved method prior to revision of the 10 CFR 830 safe harbor table.

9. Provide reasoning for selecting document types (DOE Standard, DOE handbook, DOE Spec.)

To satisfy 10 CFR 830, a standard methodology must be used; therefore other document types within the DOE Technical Standard Program (TSP), such as a Handbook that provides at most recommended practices, are not appropriate.

10. Provide an anticipated timeline for process milestones.

Milestones	Target Dates
Planned start date for draft standard development	December 2018
Planned date for draft standard to start coordination	April 2019
Review and Comment Phase – 60 calendar days	June 2019
Response Package Development – 30 calendar days	July 2019
Response Negotiation – 30 calendar days	August 2019
Final Concurrence – 10 business days	September 2019
Approval and issuance date	September 2019