

Standards Actions

Technical Standards Program Newsletter

June 2019



U.S. DEPARTMENT OF
ENERGY

OFFICE OF
NUCLEAR SAFETY



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TECHNICAL STANDARDS ACTIVITIES

NEW CONDUCT OF OPERATIONS IMPLEMENTATION HANDBOOK

On March 18, 2019, the Department of Energy Handbook (DOE-HDBK)-1226-2019, *Conduct of Operations Implementation*, was approved. This new Handbook marks the end of a long effort to update the conduct of operations *Guides to Good Practices* (Standards 1030-1045) written in the early 1990s. The Standards accompanied the original DOE Order 5480.19, *Conduct of Operations*, which was adapted from the 1989 "Guidelines for the Conduct of Operations at Nuclear Power Stations" developed for the nuclear power industry by the Institute of Nuclear Power Operations. When Order 5480.19 was revised into Order 422.1, *Conduct of Operations*, in 2010, the Guides to Good Practices were planned for revision as well, but changes in organizations, personnel, and the Department's approach to directive management delayed the process.

The Facility Representative and Safety System Oversight communities are the main federal stakeholders in the Conduct of Operations directives, so they were consulted on how to proceed. The choices were to simply cancel the Standards and archive them, revise them as separate documents, or combine them into a single new Technical Standards Program document, either a Standard or a Handbook, and revise the content. In the end, a combination approach prevailed. DOE Standard 1029, *Writer's Guide for Technical Procedures*, was cancelled and the Procedure Professionals Association (PPA) consensus standards were adopted.

The other *Guides to Good Practices* were combined into the new Handbook. The content was updated to reflect new technologies such as computerized document systems and logs, cellular telephones, video games and other hand-held or wearable devices. The text was edited for clarity and to incorporate field input accumulated over the years, and to streamline the organization and improve internal cross references.

One of the old Guides, DOE Standard 1030, *Guide to Good Practices for Lockouts and Tagouts*, was not revised into a Handbook section like the others. Standard 1030 was written before the Department adopted the Occupational Safety and Health Administration (OSHA) Lockout/Tagout Rules, so instead of writing its own examples and lessons, DOE provides references to the wealth of information already available directly from OSHA.

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TECHNICAL STANDARDS ACTIVITIES

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The next step is to update DOE Order 422.1 to reference the new Handbook instead of the superseded Standards. DOE operations and oversight personnel now have a complete suite of documents for Conduct of Operations, with program requirements in DOE Order 422.1, *Conduct of Operations*, implementation examples and best practices in DOE-HDBK-1226, *Conduct of Operations Implementation*, and assessment planning and execution assistance in DOE-HDBK-1214, *Conduct of Operations Assessment Field Handbook*.

COMMENTING IN REVCOM

The complexity and impact of Technical Standards and Handbooks, over time, has inspired lengthy comments in the form of paragraphs, bullet lists, tables and graphics, to which the Preparing Activity (PA) team must respond—Accept, Reject, Accept in Part.

Too often the reviewer selects Add Comment and pastes a paragraph containing several significant elements that should have been submitted individually by selecting Add Comment for each one. The following information has been added to Technical Standards Manager (TSM) notifications for Review and Response:

Comments consisting of multiple paragraphs, bullet lists, and tables do not translate well with PAs. Please advise Subject Matter Experts (SMEs) that comments with several major points should be broken into parts and entered by clicking Add Comment for each element of importance. As TSM, you can edit comments to correct the error or can request that SMEs reenter their comments appropriately.

Commenters should give due consideration to efforts of PA team members who may divide the comments among members according to their areas of expertise. Commenters should assume the following:

- Before entering responses, PA teams often download Excel spreadsheets or Word tables to use in discussing proper responses.
- Long paragraphs must fit in one section of a downloaded table or Excel file, making one comment display on more than one page.
- Bulleted lists may fold into one long paragraph, making any individual element difficult to detect.
- Tables prevent downloads from being completed.
- Graphics may display in Word tables but not in Excel files.
- In most incidents, the PA cannot respond adequately to multiple points in one long comment.

Automatic Submission

The Automatic Submission option—now no longer in use—added to the problem because the RevCom system would submit the organization's comment package at midnight on the deadline date. TSMs using that option were not required to assess comments, edit content, remove repetition, or correct excessively long comments.

Recent changes to RevCom allow TSMs' Alternates to submit the organizations' comment package, making the automatic submission practice no longer necessary. TSMs who must be on travel or on special assignment can assign Alternates to review and edit comments or to request that SMEs edit their own comments.

Technical Standards Program (TSP) management has eliminated automatic submission as an option for TSMs. Those who have depended upon that option for their organizations' submissions should be aware that their packages will not be sent forward.

For additional information, contact TSP Manager Jeff Feit (Jeffrey.Feit@hq.doe.gov; 301-903-0471).

SECTION 508 COMPLIANCE

The Department of Energy is required by law to follow Section 508 of the Rehabilitation Act of 1973, which requires that content made available on federal public and internal web sites, be accessible to people with disabilities, such as those with vision and hearing impairments. This requirement covers access to federally-funded programs and services, including web applications, web pages, and supporting WORD and PDF files.

Did you know that an estimated 13% of the U.S. population has some form of disability?

- 6.4M people have a visual disability
- 10.5M people have a hearing disability
- 20.9M people have a ambulatory disability
- 14.8M people in have a cognitive disability

Who is Responsible for Section 508 Compliance?

Every federal and contractor employee has a role in ensuring that Section 508 compliance requirements are followed. Government agencies rely on technology to carry out their mandates and provide information to the public, such as the creation and dissemination of files, which make ensuring access for individuals with disabilities part of everyone's job.

Who Should be Trained?

- **File Creators and Document Authors** - If you create files that may be distributed through email, posted online, or shared through electronic format.
- **Supervisors** - If you are responsible for managing staff, you must ensure they understand the importance of their documents meeting Section 508 requirements.
- **Web Managers** - If you are managing or developing a website, Section 508 requirements must be followed.
- **Project and Program Managers** - If you are responsible for planning a project or managing a program, be sure to incorporate time for Section 508 reviews and corrections.

What Tools are Needed?

To check and remediate a PDF document per Section 508 requirements, the reviewer must have Adobe Acrobat XI Pro on their computer. Adobe Acrobat XI Pro is provided at a cost to the individual Program Office and the Program Office Director must approve this purchase.

Need More information?

The General Services Administration (GSA) Government-wide Section 508 Accessibility Program official website:
<https://www.section508.gov/>

To Create Accessible Electronic Documents:
<https://www.section508.gov/content/build/create-accessible-documents>

For Related Laws and Policies:
<https://www.section508.gov/content/learn/laws-and-policies>

TECHNICAL STANDARDS ACTIVITIES

DOE TECHNICAL STANDARDS UPDATES

The following is an overview of recent Technical Standards actions for March and April 2019. A complete list of on-going DOE Technical Standards actions can be found on the “Monthly Status Reports” posted on the Technical Standards Program website: www.standards.doe.gov.

Project Justification Statements Posted in RevCom for 15-day Review

Proposed Revisions

DOE-STD-1090-2011, *Hoisting and Rigging*

Point of Contact (POC): Maurice Haygood, Office of Worker Safety and Health Policy (AU-11) Phone: 301-903-1787

DOE-HDBK-1163-2003, *Integration of Multiple Hazard Analysis Requirements and Activities*

POC: Steve Singal, Office of Worker Safety and Health Policy (AU-11) Phone: 301-903-2990

DOE-STD-1187-2007, *Beryllium-Associated Worker Registry Data Collection and Management Guidance*

POC: Daniela Stricklin, Office of Domestic and International Health Studies (AU-13) Phone: 301-903-0947

DOE-SPEC-1142-2001, *Beryllium Lymphocyte Proliferation Testing (BeLPT)*

POC: Daniela Stricklin, Office of Domestic and International Health Studies (AU-13) Phone: 301-903-0947

Proposed New Development

DOE-HDBK, *Seismic Evaluation Procedure for Equipment in U. S. Department of Energy*

POC: Sharon Jasim-Hanif, Office of Nuclear Safety Basis and Facility Design (AU-31) Phone: 301-903-4664

Technical Standards Posted in RevCom for 60-day Review

Proposed Reaffirmation

DOE-STD-1112-2016, *Department of Energy Laboratory Accreditation Program for Radiobiology*

POC: James Dillard, Office of Worker Safety and Health Policy (AU-11) Phone: 301-903-1165

Recently Approved Standards

DOE-STD-1153-2019, *A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota*

POC: Katharine McClellan, Office of Public Radiation Protection (AU-22) Phone: 202-586-0183

DOE-HDBK-1226-2019, *Conduct of Operations Implementation*

(replaces DOE Standards 1030-1045, the former *Guides to Good Practices associated with former DOE Order 5480.19, Conduct of Operations Requirements for DOE Facilities*. These documents have been cancelled and posted in the TSP website Archive.)

POC: James Shaw, Office of Quality Assurance and Nuclear Safety Management Programs (AU-32)

Phone: 301-903-1986

DOE STD-1183-2019, *Nuclear Safety Specialist Function Area Qualification Standard*

POC: Al MacDougall, National Training Center (EA-50) Phone: 505 845-5549

DOE-STD-1228-2019, *Preparation of Documented Safety Analysis for Hazard Category 3 DOE Nuclear Facilities*

POC: Caroline Garzon, Office of Nuclear Safety Basis and Facility Design (AU-31) Phone: 301-903-8275

DOE STD-1151-2019, *Facility Representative Area Qualification Standard*

POC: Al MacDougall, National Training Center (EA-50) Phone: 505-845-5549

UPCOMING MEETINGS & CONFERENCES

2019 National Cleanup Workshop**When:** September 10-12, 2019**Where:** Alexandria, VA**American Concrete Institute Fall 2019: *A River of Knowledge*****When:** October 20-24, 2019**Where:** Cincinnati, OH**Energy Facility Contractors Group (EFCOG)
Integrated Safety Management & Quality Assurance Meeting****When:** November 11-14, 2019**Where:** Y-12 National Security Complex, Oak Ridge, TN**2019 American Nuclear Society Winter Meeting and Nuclear Technology Expo****When:** November 17-21, 2019**Where:** Washington, DC

To learn more about the DOE Technical Standards Program or
to view the *Standards Actions* newsletters,

visit the website:

www.standards.doe.gov