Q1: Appendix A.1 of the STD-1228 says: “In most cases, the hazard evaluation process will identify preventive or mitigative controls that do not rise to the level of SS but still enhance the safety of the facility. These controls would be identified in the hazard evaluation, but not explicitly credited with a SS designation. Such controls are maintained in accordance with SMPs.” This mirrors language from Section 3.3.3 of DOE-STD-3009-2014 that discusses other hazards controls, however the concluding sentence in Section 3.3.3, DOE-STD-3009-2014 says “Such controls are maintained in accordance with safety management programs and the Unreviewed Safety Question [USQ] process.” What is the intent of omitting the reference to the USQ process in Standard 1228?

A1: Neither sentence identified in Q1 states a requirement. The sentences provide only explanatory discussion. There is no difference in how other hazard controls should be maintained when using STD-1228. The USQ process must be implemented as required by 10 CFR 830, Nuclear Safety Management, regardless of which safe harbor methodology is used (e.g., STD-3009-2014 or STD-1228-2019).