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SENSITIVE

DOE-STD-1075-94
July 1994

DOE STANDARD

STANDARD FOR DEVELOPING AND ISSUING DOE SAFETY GUIDES AND IMPLEMENTATION GUIDES



U.S. Department of Energy
Washington, D.C. 20585

AREA SAFT

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Order No. DE94018438

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FOREWORD

1. This Department of Energy (DOE) standard was prepared by the Office of Environment, Safety and Health with the assistance of James E. Konklin of Argonne National Laboratory.
2. Beneficial comments (recommendations, additions, and deletions) and any pertinent data that may improve this document should be sent to the Manager, DOE Technical Standards Program (EH-62), U.S. Department of Energy, Washington, D.C. 20585, by letter or by sending the self-addressed Standardization Document Improvement Proposal (DOE F 1300.3) appearing in Attachment A to this document.
3. This standard provides information on the purpose of safety and implementation guides (hereinafter referred to as guides) as well as guidance on the recommended style, format, and content to be used when developing guides. With the exception of the cover which should be standardized for easy recognition of the guides, the use of the style, format, and content guidance in this standard is intended to be flexible to accommodate preferences of the authors and users of the guide.
4. This standard also describes the administrative process that should be used for the development and issuance of guides. The administrative process should be used consistently by all authors of guides.
5. DOE intends to issue guides as part of its directives system. Guides are issued to provide supplemental information regarding the Department's expectations on specific provisions of Rules, Orders, Notices, Manuals, Immediate Action Directives, Regulatory Standards (Regulatory Standards are standards which are included in a rule), or Policies. Guides may also identify acceptable methods for implementing these provisions; however, they do not establish requirements.
6. The use of this standard will facilitate consistency in the format and content of guides and ensure that they are issued in an acceptable

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manner. Nothing in this standard is intended to supersede any requirement in a Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard.

7. DOE N 1321.138, "Departmental Directives System: Interim Improvement Notice 2," dated February 16, 1993, describes the hierarchical system of documents used by DOE to establish its nuclear safety policy, and the objectives, requirements, and guidance for implementing that policy. A similar document is under preparation for the entire directives system.

The hierarchy of the DOE regulation and directives documents is shown in Figure 1. DOE policy statements are the highest tier of DOE directives. All other requirements and guidance should flow from Departmental policy.

The second tier includes the requirements documents, such as Rules, Orders, Notices, Manuals, Immediate Action Directives, and Regulatory Standards for implementing the top-level policy. Although Rules cannot be overridden by DOE policy because they are enforceable by law, the Rules developed by DOE should flow from DOE policy

The third tier, which is the subject of this standard, includes the guidance documents (such as implementation guides and safety guides). The guides discuss acceptable methods and approaches for implementing the requirements documents or for implementing Policies. Guides will address specific Rules, Orders, Notices, Manuals, Immediate Action Directives, Regulatory Standards, or Policies. Some guides may address both a regulation and a directive if the regulation and the directive relate to the same subject (for example, maintenance).

The fourth and last tier includes technical standards (such as this document), which describe established practices and procedures that may be used to implement specific requirements or objectives. Technical Standards will address subjects which are applicable to multiple requirements documents such as the development of implementation plans for requirements.

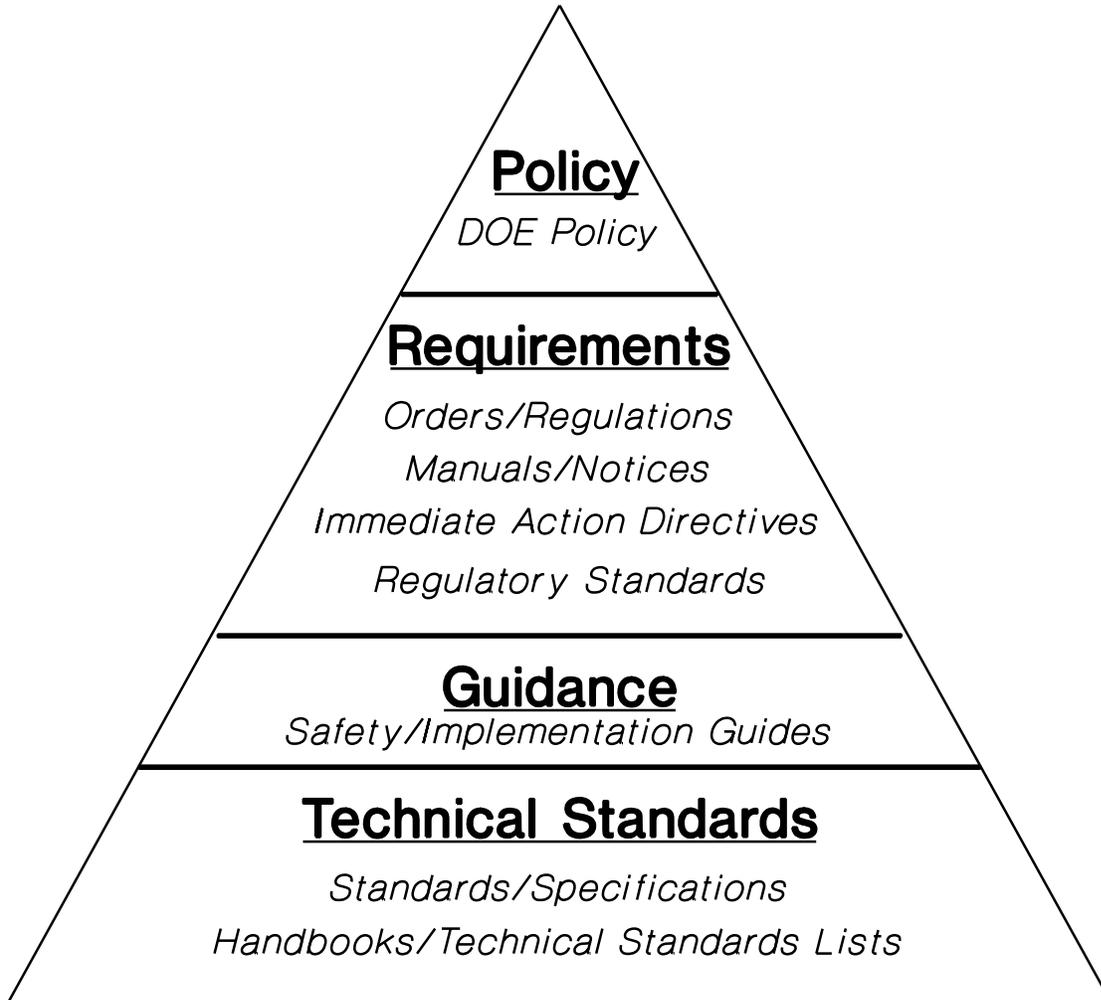


Figure 1: Hierarchy Triangle

8. Throughout this standard, the words "should" and "shall" are used to clarify which actions need to be done to meet this standard. The word "shall" is used to denote actions which must be performed if this standard is to be met. The word "should" is used to indicate recommended practice. DOE Technical Standards do not establish requirements. However, all or part of the provisions in a standard can become requirements under the following circumstances:

- (1) they are explicitly stated to be requirements in a Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard; or

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- (2) the organization makes a commitment to meet a standard in a contract or in a plan required by a Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard (such as in an implementation plan).

In such circumstances, the "shall" statements would become requirements.

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1. SCOPE

1.1 Scope. This standard establishes the style, format, content, and process for the preparing and issuing Department of Energy (DOE) guides.

1.2 Applicability. This standard is intended for use by all DOE components (including their contractors) when preparing, revising, commenting on, or issuing DOE guides.

2. APPLICABLE DOCUMENTS

U.S. Government Printing Office (GPO): Style Manual, dated March 1984.

DOE N 1321.138, Departmental Directives System: Interim Improvement Notice 2, February 16, 1993.

Federal Standard 376 B, Preferred Units for General Use by the Federal Government, March 12, 1993.

3. PURPOSE OF GUIDES

DOE guides provide information on the Department's expectations on meeting the provisions of Rules, Orders, Notices, Manuals, Immediate Action Directives, and Regulatory Standards (hereinafter referred to as requirements documents) or Policies. Guides may identify acceptable methods for implementing those provisions. Guides may also identify other acceptable principles and practices by referencing Government or non-Government standards.

In the interest of brevity and broadness of application, approaches and methods of implementation are normally discussed only in general terms in the Rules, Orders, Notices, Manuals, Immediate Action Directives, and Regulatory Standards. More detailed discussions of those approaches and methods, as well as other information useful in understanding and implementing the requirements are contained in guides.

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Guides are not substitutes for requirements. Although the guides should be considered when establishing the implementing activities for a facility, a reasonable opportunity will always be provided to demonstrate compliance by actions other than those set forth in guides. However, if a provision in a DOE guide is included explicitly in a contract, or in a contract or plan required by a DOE Rule, an enforceable obligation may be thereby created through those documents.

Guides may be called either safety or implementation guides as preferred by the organization developing the guide; however, the term "safety guides" should be reserved for issues related to safety.

4. STYLE OF GUIDES

4.1 General text guidance. The text should be written in clear and simple language, free of vague terms or those subject to misinterpretation. Unfamiliar words, words having more than one meaning, and unusual trade or technical terms should be avoided. Sentences should be short and clearly written.

4.2 Grammar and style. The Government Printing Office (GPO) Style Manual should be used as a guide for capitalization, spelling, punctuation, syllabification, and other elements of grammar and style, except in cases where DOE requirements differ.

4.3 Symbols. Only commonly used symbols should be used in the text. If an unusual technical symbol is necessary, then an explanation of the symbol's meaning should be given in a "Definitions" section of the guide.

4.4 Use of Abbreviations. Abbreviations used in guides should conform to the GPO Style Manual. The first time an abbreviation is used in text, it should be spelled out in full text and followed by the abbreviation enclosed in parentheses.

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4.5 Use of decimals. Decimals should be used in documents instead of fractions whenever possible.

4.6 Units of Measurement. The use of units of measurement should follow the provisions of Federal Standard 376 B, "Preferred Units for General Use by the Federal Government," March 12, 1993. In addition, the Institute of Electrical and Electronics Engineers (IEEE) Standard 268-1992, "Standard Metric Practice," provides guidance on the use of the metric system.

4.7 Margins. All margins for the text (top, bottom, left, right) should be 1 inch.

4.8 Justification. The body of the text should be left-justified, rather than full-justified.

4.9 Spacing. The text should be placed 1.5 spaces apart. Headings should be placed three spaces from the previous line of text.

4.10 Page numbers. Page numbers should be centered at the bottom of every page beginning with the first page of the Foreword of the document. The Foreword, the Table of Contents, and the Acknowledgements page (if it is made separate from the Foreword) should be numbered in lower case Roman numerals, beginning with *ii*. The pages for the body of the document should be numbered sequentially with Arabic numerals.

4.11 Fonts. The font should not be ornate or hard to read. The use of commonly existing fonts such as Times Roman, Letter Gothic, or Courier is preferred. The font size should be either 10 or 12 pitch for the body of the guide. Font sizes may be varied for title pages and illustrations.

4.12 Tables, charts, and figures. Text that references tables, charts, or figures should be sufficiently detailed to make their purpose clear. Tables, charts, or figures should be placed immediately following the paragraph containing the first reference to the table, chart, or figure. If more space is required tables, charts, or figures may be placed on the

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following page. Items which require multiple pages may be placed in appendices.

4.13 Figure, chart, and table numbering and titles. Each figure, chart and table should be numbered consecutively throughout the document with Arabic numerals in order of their reference in the text, even if there is only one of each referenced in the document. A separate series of numbers should be used for each type (e.g., Figure 1, Figure 2, Figure 3 . . . and Table 1, Table 2 . . .). Figures, charts, and tables should also be titled.

4.14 Footnotes. Footnotes should be placed at the bottom of the page that includes the reference to the footnote. Footnotes should be numbered consecutively throughout the document with Arabic numerals.

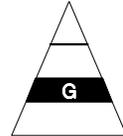
4.15 Section Numbering. Since guides are not directives or standards, they need not comply with the numbering systems established for those documents. Suggestions for the numbering of guides are provided in the body of this document.

4.16 Definitions. Standard definitions of terms should be used when available. The Directives System Manager should be contacted for information on existing standard definitions.

5. FORMAT AND CONTENT OF GUIDES

5.1 Title Page. The title page shall adhere to the format example in Figure 2. The title page for radiation protection guides should also contain the radiation symbol. The title page shall contain the following elements:

- (a) the alphanumeric designation of the guide (in the upper right corner);



IMPLEMENTATION GUIDE

for use with

10 CFR PART 830.120

QUALITY ASSURANCE



**ASSISTANT SECRETARY for
ENVIRONMENT, SAFETY AND HEALTH**

FINAL GUIDE - FOR UNLIMITED USE AND DISTRIBUTION

Figure 2: Example Title Page

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(b) the date of issue (in the upper right corner);

(c) the triangular DOE document hierarchy logo, with the guidance level of the triangle shaded and a "G" to indicate that the document is a guide (see Figure 2: Example Title Page) (in the upper right corner);

(d) the name of the Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard for which the guide provides clarifying and implementing information (in the upper center);

(e) the title of the guide (in the center)

(f) the DOE logo (in the center, below the title);

(g) the name of the DOE Office of Primary Interest (OPI) which developed the guide (on the bottom center); and

(h) one of the following distribution statements (on the bottom) as follows:

(1) FINAL GUIDE - FOR UNLIMITED USE AND DISTRIBUTION

(2) INTERIM GUIDE - FOR INTERIM USE AND COMMENT

(3) DRAFT GUIDE - FOR EXPEDITED REVIEW AND COMMENT

These statements may be modified to indicate any distribution limits.

5.2 Foreword. The first page beyond the title should contain a Foreword. The Foreword should include, as a minimum, an implementation paragraph and a beneficial comments paragraph. The implementation paragraph should be of the form:

1. This Department of Energy guide is approved for use by [name of the OPI who prepared the document] and is available for use by [state to whom the guide is available, typically - "all DOE components and their contractors"].

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If a restricted distribution applies to the guide, the implementation paragraph should conclude with the words "is available within the distribution limits noted on the cover page," in lieu of "is available for use by all DOE components and their contractors."

The beneficial comments paragraph should be of the form:

2. Beneficial comments (recommendations, additions, deletions and any pertinent data that may improve this document should be sent to: [name and address of OPI].

If desired, additional paragraphs may be included to explain the purpose of the document or to provide other background information. The Foreword may also include a list of acknowledgements and/or authors in which case, each individual should be identified by name and company affiliation or Departmental component. As an alternative, a list of acknowledgements, authors, and/or contributors may be included in an appendix.

5.3 Table of Contents. The single word "CONTENTS" in capital letters should head the contents page. The headings "PARAGRAPH" and "PAGE" should be placed above the area where numbers and headings for sections and their page numbers are listed. The table should also list figures, tables, charts, appendixes, and indices if these are included in the guide. Page numbers should be entered corresponding to the location of each item listed.

5.4 Introductory Sections. The introduction, application, and general information sections should follow the table of contents. These sections should be numbered with uppercase consecutive Roman numerals placed flush left. The title of each of these sections should be written in all capital letters and indented 0.5 inches from the margin. The body of the text in these portions of the document should also be indented 0.5 inches from the left margin. The recommended contents of each of these sections is as follows:

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5.4.1 Section I, Introduction. This section should identify and provide a brief description of the Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard for which the guide has been written. The introduction should discuss how meeting the criteria in the specific requirements document or Policy will help DOE achieve its mission and goals. The introduction should also briefly describe the general purpose of the guide. Finally, the introduction should encourage users of the guides to provide feedback to the OPI on the success or difficulties encountered in the application of the guide.

5.4.2 Section II, Application. This section should indicate the functions, activities, and/or facilities to which the guide applies. Typically, the guide would be applicable to the same body of functions, activities, and/or facilities as the parent requirements document or Policy. If so, they should be referenced or repeated here. Applicability should be specific. The information provided should be sufficient for the reader to determine if the guide applies to the specific functions, activities, and/or facilities of interest to the reader.

This section should also briefly discuss the application of the safety guide or implementation guide to the requirements document or Policy, including the scope of the guide and the fact that acceptable alternative approaches and methods may be used for implementing the provisions of the requirements document or Policy. This section should point out any important interfaces or interrelationships between this guide and other requirements or guidance documents.

5.4.3 Section III, General Information. This section should provide a general description of the more important features of both the requirements document or Policy and the guide, and should explain in some detail the use of a graded approach to more efficiently utilize available resources in the implementation process.

5.4.4 Section IV, Guidelines. This section of the guide should specify recommended procedures and processes for implementing and maintaining

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compliance with the subject requirements document or Policy by DOE components and contractors. This section should be divided into subsections which discuss each of the major technical, management, or administrative criteria or categories of criteria. Each criteria subsection should contain a discussion, and if applicable, a list of applicable standards and information concerning supplemental guidance documents. These are discussed in more detail in the succeeding paragraphs.

Criteria sections should be numbered with consecutive Arabic numerals placed flush left. The title of the criteria sections should be underlined, typed in bold letters, and written using all capital letters (such as, **3. CONSTRUCTION**). The title should be placed 0.5 inches from the left margin. Each succeeding subsection of the criteria sections should be numbered with the Arabic numeral of the applicable criteria section, followed by the decimal point and the consecutive Arabic numeral for the specific subsection (such as, **3.1 DISCUSSION**). The number for each subsection should be placed flush left. The title of each succeeding subsection should be typed in bold letters, should be written using all capital letters, and should be placed 0.5 inches from the left margin. The body of each section and subsection should be left-justified and indented 0.5 inches from the left margin.

5.4.4.1 Discussion. The Discussion section for each criteria (or category) should (1) describe DOE's expectations regarding the implementation of the provisions contained in the requirements document or Policy; (2) discuss the acceptability of various principles, practices, and methods for implementing the provisions; (3) explain the DOE position concerning each of the technical, management, or administrative areas covered by the requirements document or Policy; and (4) provide details and/or examples of the application of the graded approach where appropriate. Examples of acceptable programs may also be useful.

The author of the guide should consider referencing available documents on industry good practices when discussing acceptable methods for meeting the requirements.

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5.4.4.2 Applicable Standards. Following each Discussion section, the author should list the standards that provide endorsed methods for implementing some or all of the requirements discussed in the previous "Discussion" section. The standards listed may include Government and non-Government standards, as well as those developed and issued as part of the DOE Technical Standards Program. The use of previously developed standards is encouraged as a means to develop more consistent programs and reduce the costs associated with new standards development. The author may tailor the endorsement of the standards by indicating any exceptions or additions to the information in the standards or by pointing out the specific parts of each listed standard that contain acceptable principles, practices, and approaches.

Standards should be numbered consecutively with Arabic numerals. The format of the standards referenced should adhere to the GPO style manual. In some cases, it may be more appropriate to provide the applicable standards in a single combined list at the end of the body of the document or in an appendix rather than in separate lists following each Discussion section.

5.4.4.3 Supplemental Guidance Documents. A list of supplemental guidance documents containing pertinent information may be included following the Applicable Standards section (or following the Discussion section if an Applicable Standards section is not included). Whenever practical, specific citations should be made to applicable sections, paragraphs, tables, or figures within the listed supplemental guidance documents. The author should also indicate the degree to which their use is endorsed.

The titles of the supplemental guidance documents should be numbered consecutively with Arabic numerals. The format of the citations should adhere to the GPO style manual.

In some cases, it may be more appropriate to provide the list of applicable guidance documents in a single combined list at the end of the guide rather than in separate lists within each section of the guide.

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6. PROCESS

6.1 Initiation of the Process. Before preparing a draft of a guide, the OPI shall contact the Directives System Manager in the Office of Human Resources and Administration. The Directives System Manager shall then issue a project number to authorize the initiation of a new implementation guide or safety guide. The project number shall be of the form: G-[number of the parent requirements document or Policy]-[revision number]. For example, the project number for the guide for DOE Rule 830.120, "Quality Assurance Requirements," is G-830.120-Rev.0.

In order for the applicable guide to be more readily identified, it is preferable that only one guide be developed for each requirements document or Policy. Specific subjects may be addressed in technical standards which are referenced in the applicable guide or in appendices to the guide. If it is not practical to issue only a single guide for the requirements document or Policy and multiple guides are to be issued, then each guide shall be given a unique identifying number. The number shall be of the form: G-[number of the parent requirements document (or Policy)/extension number]-[revision number]. The extension number shall be determined in consultation with the Directives System Manager and will typically be a consecutive designator (such as A, B, C, etc.). The extension number may also be a relevant number, such as the specific paragraph number in a Rule for which the guide provides clarifying information.

The Directives System Manager shall add the new project to the weekly status list to inform interested parties of the planned development of a new guide.

6.2 Development of the Draft Guide. After the Directives System Manager issues a project number, the OPI is responsible for developing the draft guide. To ensure that all important issues are considered, the OPI should develop the draft guide with the participation of a working group having representatives from each of the affected DOE elements. The OPI may also include contractor representatives in the working group if their participation is expected to benefit the development of the guide. The

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working group should be convened as early as practicable so that the group's recommendations can be incorporated throughout the development process. To expedite the process and reduce resource impacts, the OPI should consider using the same working group for the guide as was used for the development of the associated Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard.

6.3 Distribution of Draft Guide for Review and Comment. Following completion of the draft and the decision of the OPI that the draft is ready for formal review and comment, the OPI shall contact the Directives System Manager to establish the distribution list for review and comment. The distribution list will normally include the Directives Points of Contact (both at DOE Headquarters and in the field) for the affected DOE and contractor organizations. As a minimum, the OPI shall distribute copies of the draft guide for review and comment according to the Directives System Manager's list. The OPI shall distribute the draft guide with a cover letter or memorandum that indicates the final date and recipient of the comments. The comment period shall be no less than 60 days from the date of distribution of the draft guide, unless specific relief is granted by the Directives System Manager (the Directives System Manager may reduced the comment period to 45 days when an expedited distribution system is established).

6.4 Field and Headquarters Participation. Comments from the Headquarters and field working level are essential because guides will normally contain detailed information on the implementation of requirements documents or Policies. Therefore, when the draft guide has been distributed for review and comment, the OPI should encourage field and Headquarters participation in the comment process. Participation should include representatives from the affected DOE program and field offices, management and operating contractors, and support contractors. Two ways of ensuring this participation are to establish either a workshop with field and Headquarters participation or a series of meetings in the field and Headquarters to discuss the intent of the draft guide with individuals who will be directly impacted by the proposed guide.

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The meetings should be structured to encourage communication and constructive recommendations for changes to ensure that the information provided in the guide is appropriate, understandable, and effectively communicated. The meetings should provide clarifying information for field and Headquarters individuals who are actively involved in the review of the draft guide and should occur during the comment period to allow the participants to read the proposed guide prior to the meetings and submit comments afterwards. This timing is expected to result in more valuable feedback being provided during the formal comment process.

6.5 Comments. The reviewers of the draft guide shall return any comments to the person specified in the cover letter or memorandum, within the time period specified in the letter or memorandum. Comments shall be returned through the individuals listed on the distribution list transmitted with the draft guide for review and comment. Comments returned shall identify the page and paragraph of the draft guide to which the comment applies. The comments shall be identified as essential or suggested. Essential comments are those which, if not addressed, would make the document technically unacceptable to the organization. Comments which are not specifically identified as "essential" will be considered to be "suggested." All comments must be supported with detailed rationale and include suggested word changes. Comments received after the suspense date will be held for the next revision, unless it is possible to address them without affecting the timely approval of the document.

The OPI shall develop and maintain a record of the recommendations received, incorporated, or not used. The OPI shall provide feedback to each of the commentors, either formally or informally, including the reasons for not accepting any of the comments. The OPI should also maintain a record of the formal and informal communications. Records of the comments, reasons for rejections, and communications should be kept at least until the next substantial revision of the guide is made (normally the sunset review specified below).

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6.6 30-Day Waiting Period. Following completion of any necessary revisions to the guide in response to comments, the OPI shall send a copy of the proposed final guide to the head of each interested DOE element with the notification that the guide will become final in 30 days. Whenever practicable, a copy of the proposed final guide and the 30 day notice should also be sent to each organization/individual who directly transmitted comments to the OPI during the formal review and comment process. If there are substantive changes to the document after the comment draft, the proposed final guide and the notice should be transmitted to all reviewers from the original list, not just to those who made comments. The concurrence of the program offices or the Field Management Office is not required.

6.7 Transmittal of the Final Guide. Following the 30-day waiting period, the OPI will transmit the proposed guide to the Directive Systems Manager in the Office of Human Resources and Administration. The Directives System Manager will formally issue and distribute the guide.

6.8 Timeliness of Issuing Guides. Guides should be developed and issued concurrent with the specific Rule, Order, Notice, Manual, Immediate Action Directive, or Regulatory Standard for which it provides guidance. If that timing is not feasible, then the guide should be issued as soon as possible after issuance of the related requirements document or Policy and available to the individuals and organizations responsible for implementing the requirements no less than 60 days before the compliance date of the requirements. Additional time may be necessary for complex requirements.

6.9 Sunset Review. The guides will be subject to a Sunset Review on the same schedule as the parent document (associated requirements document or Policy), or every four years in the cases where there are no parent sunset reviews (e.g., regulations).

7. DEFINITIONS

7.1 DOE Components. DOE Secretarial Offices, field organizations, management and operating contractors, DOE contractors, and laboratories.

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7.2 DOE Directives System Manager. The Director of the Office of Organization and Management, Office of Human Resources and Administration.

7.3 Directives Points of Contact (DPC). The central points of contact designated by Heads of Departmental Elements to represent them on all directives matters and to act as liaison between their organizations and the Directives System Manager.

7.4 Office of Primary Interest (OPI). The DOE office responsible for originating and maintaining a requirements document or Policy.

7.5 Sunset Review. A process period review to determine the adequacy, correctness, and completeness of a directive while ensuring that necessary or beneficial changes are approved and their disposition expedited.

8. SUBJECT TERM (KEY WORD) LISTING

The following list of subject terms (key words) is provided so that this document may be found during retrieval searches.

guidance

guide

hierarchy

implementation guide

safety guide

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CONCLUDING MATERIAL

Review Activity

DOE

AD (now HR)
DP
EH
EM
EP
ER
FE
GC
IG
NS (now EH)
OE (now NN)
PR
RW
SA (now NN)

National Laboratories

ANL
BNL
INEL
LANL
LBL
LLNL
METC
PNL
Sandia
SSCL
SLAC

Area Offices

Amarillo
Brookhaven
Dayton
Golden
Kansas City
Kirtland
Princeton
Pinellas

Preparing Activity:

DOE-EH-62

Project Number:

SAFT-0014

Field Offices

AL
CH
ETEC
FERNALD
ID
NV
OR
RL
RF
SR
SF

Power Authorities

BPA
WAPA