

DOE TECHNICAL STANDARDS PROGRAM PROCEDURES

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COORDINATING DOE TECHNICAL STANDARDS

U.S. Department of Energy
Office of Nuclear Safety
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1. SCOPE

1.1 Purpose

This procedure provides guidance on the formal coordination of the Department of Energy (DOE) Technical Standards in the DOE Technical Standards Program (TSP). The purpose of coordination of draft DOE Technical Standards is to solicit and receive comments from interested persons and organizations in order to improve and correct DOE Technical Standards. DOE Technical Standards are coordinated through the electronic TSP RevCom process.

1.2 Applicability

This procedure applies to all DOE Headquarters and field organizations, management and operating contractors, integrating contractors, and laboratories (hereafter referred to collectively as TSP participants) working to the latest revision of DOE Order (O) 252.1A, *Technical Standards Program*.

2. GENERAL

2.1 Extent of Coordination (Authors)

Figure 1 depicts the extent of coordination for the different formats of TSP documents. New and revised DOE technical standards must be coordinated through the TSP RevCom process.

The author may make minor editorial or administrative changes to existing documents as a Change Notice without a coordination review (refer to DOE-TSPP-7-2013), provided that the TSP Manager or designee agrees that the proposed changes are editorial or administrative.

Some DOE Technical Standards processed under the DOE TSP involve additional coordination and processing steps as defined in the following discussion.

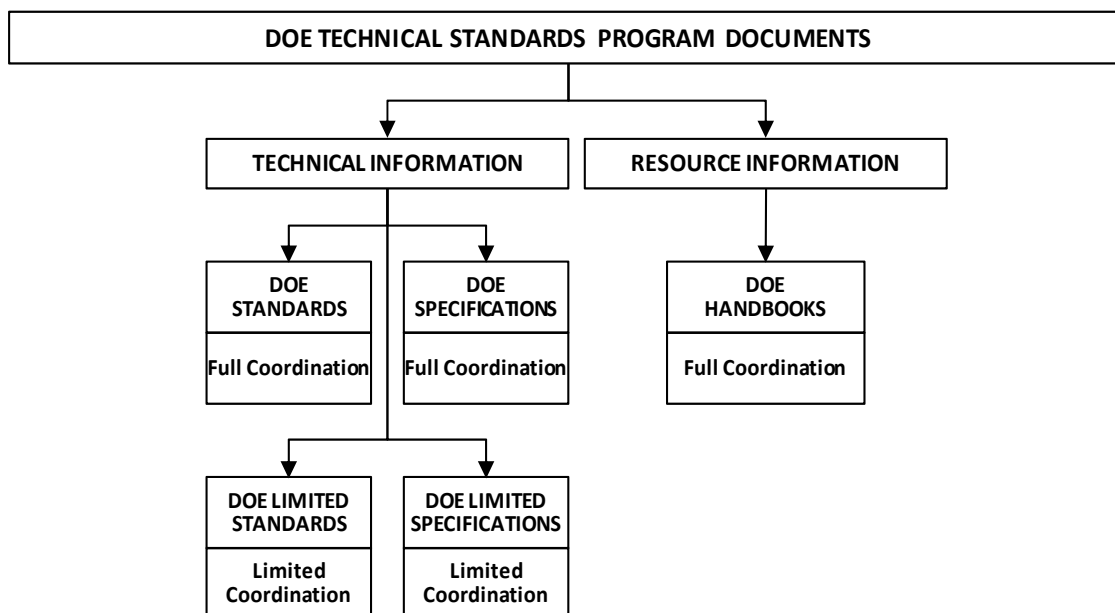


Figure 1. Coordination of DOE Technical Standards Program Documents

2.2 Full Coordination Documents

Full coordination documents are those used by more than one program or project within DOE and are reviewed by a broad cross section of the Department. The author must coordinate new or revised DOE Technical Standards, as well as proposals to reaffirm or cancel existing DOE Technical Standards, with:

- the Technical Standards Managers (TSMs),
- the Office of Primary Interest (OPI) (when not the author),
- the chairpersons of DOE topical committees (if applicable),
- selected Subject Matter Experts (SMEs) within the DOE complex, and
- any other person within the DOE complex who has expressed an interest in the subject matter.

2.2.1 Limited Coordination Documents. Limited coordination documents are those that will be used by only one DOE program or project for a specific purpose and for a limited period of time. Careful consideration should be made before developing limited coordination standards or specifications that bypass the full review process because they do not represent a consensus position within the Department. The primary purpose of a limited coordination document is to fill an immediate need until a fully coordinated document can be completed. Limited coordination standards and specifications must either be replaced by fully coordinated documents or canceled at the end of two (2) years.

Limited coordination documents are coordinated in the same manner as full coordination documents, except as follows:

- The review period is 30 days, rather than the standard 60 days.
- The review can be limited to the originating organization and any other DOE or outside organization directly affected by the draft standard.

2.2.2 Coordination with the Defense Nuclear Facilities Safety Board. New or revised nuclear safety-related DOE Technical Standards are to be coordinated with the Defense Nuclear Facilities Safety Board (DNFSB) through the Office of the Departmental Representative to the DNFSB (HS-1.1), which will be responsible for entering DNFSB comments into TSP RevCom.

2.2.3 Coordination with the Office of the General Counsel. When draft DOE Technical Standards are circulated for review through TSP RevCom, the Office of the General Counsel will determine whether Congressional notification is required and will make such notifications.

Coordination with the Central Technical Authority (CTA). In accordance with DOE O 410.1, *Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*, CTAs are required to concur on all draft DOE Technical Standards actions related to nuclear safety matters before they are approved.

2.2.4 Coordination of Technical Qualification Standards. For DOE Functional Area Qualification Standards, additional special coordination is outlined in

DOE O 426.1 Chg 1, *Federal Technical Capability*. Following coordination, Functional Area Qualification Standards must be approved by the Federal Technical Capability Panel. Functional Area Qualification Standards are coordinated with DOE Federal organizations only.

3. COORDINATION PROCESS

3.1 Overview

The coordination process for new and revised DOE Technical Standards consists of four major phases:

- Review and Comment – draft standard is provided for review and comment by various reviewing organizations
- Comment Response – Preparing Activity develops responses to the comments received
- Response Negotiation - Preparing Activity and various Reviewing Activities negotiate comment responses in an effort to reach resolution prior to concurrence
- Concurrence – draft standard with comment resolutions incorporated is provided for concurrence review to all affected organizations

The standard comment period for a DOE Technical Standard is 60 days for full coordination documents and 30 days for limited coordination documents. In special circumstances, such as an imminent safety issue or high level commitment, the Preparing Activity Senior Line Manager and the Technical Standards Program Manager (or designee) may agree upon a shorter coordination time.

When requested, the author may also extend the comment period to accept additional late comments. See Section 3.2.4 of this Procedure for additional discussion on setting and resetting due dates.

Following the end of the comment period, the author has 30 days to respond to comments. The Technical Standards Program Manager or designee may extend this period if the author requests. TSP RevCom is a web-based process that facilitates the coordination process for DOE Technical Standards by enabling participants to review and comment on draft DOE Technical Standards. It makes draft documents available for viewing over the Internet, provides a means to submit electronic comments and responses, and promotes communication by making the comments visible to those using the process.

Three online guides are available on TSP RevCom for:

- Administrators
- Reviewers (TSMs, Delegates, SMEs)
- Authors (Preparing Activity)

This procedure was written to complement those guides. Please report any discrepancies between this procedure and the TSP RevCom guides to the TSP at TechStdPgm@hq.doe.gov.

The following paragraphs describe the steps to be taken to process a draft document through TSP RevCom. Figure 2 outlines these steps visually to make it easy to see the responsible party and the sequence of the activities.

With regard to draft standards originating from the Office of Health, Safety and Security (HSS), a mandatory, Pre-RevCom Management Review (PRMR) must be completed. The extent of this review is determined by HSS management. Once this PRMR is completed and the appropriate signatures are acquired, the draft standard is eligible for posting in TSP RevCom.

In TSP RevCom, Topical Committee Chairpersons are considered to be equivalent to TSMs. Wherever the term TSM is used, the instructions also apply to Topical Committee Chairpersons.

3.2 Review and Comment Phase

3.2.1 Prepare Coordination Memorandum to Initiate Coordination (author). The author initiates the coordination process by sending a coordination memorandum to the TSP Manager (see Attachment A). At a minimum, the coordination memorandum must specify:

- A point of contact for the author (including telephone, fax number and an e-mail address),
- If the document is being submitted for limited coordination and the specific affected organizations,
- A list of any specific topical committee chairpersons and subject matter experts who should be alerted to the opportunity to review the draft standard,
- The OPI (if not the author),
- Any survey questions to be asked through the TSP RevCom process, and
- Any DOE commitments to internal or external organizations that might affect the schedule.

Along with the memorandum, the author must submit an electronic version of the draft DOE Technical Standard in Word format and a copy in PDF format. The TSP will use the electronic versions to post the document on TSP RevCom.

The coordination memorandum must be signed by the Preparing Activity's DOE Senior Line Manager. All draft standards should contain a clear statement indicating that the document is a draft copy and has not been approved for issue.

3.2.2 Launch Review (TSP Administrators). Following receipt of the coordination memo, the TSP will use the TSP RevCom process to:

- Create a new document record.
- Check off the "Response" box to ensure the author receives notification when a comment package is submitted.
- Parse and upload the document on TSP RevCom.

- Add any survey questions requested by the author.
- Upload the original unparsed version of the document so that it is available in the full text for those who want to download a copy and review it in its entirety.
- Assign the author. The author is generally the point of contact named in the transmittal memo. When the author is assigned in TSP RevCom, that person is given the authority to respond to comments and design, view, and print comment reports in the TSP RevCom process.
- Assign participants and manage the workflow for the draft standard. The workflow specifies the review phases and schedules and identifies the organizations assigned to review the draft document. It also establishes what organizations are subordinate to other organizations within DOE. The structure of subordinate organizations may vary with the office. For example, the DOE site TSM at Idaho may request that all contractor comments go through the Idaho DOE site TSM, while the Richland DOE site TSM may prefer to have the contractors report directly to the TSM for the Office of Environmental Management so each reviewer has more time to comment. TSP RevCom will automatically send comments from subordinate organizations through the TSM for that organization. The TSM will consolidate and edit comments from subordinate organizations.
- Set review dates. The TSP will set the date that the draft document is available for comment. Generally this will be the date that it is loaded onto the process. The TSP will set the closing date for comments (Refer to Section 3.2.4 of this Procedure; this is generally 60 days for full coordination and 30 days for limited coordination.) The TSP will also set the resolution date for the author to respond to the comments.
- Create notification messages. TSP RevCom provides the TSP with the ability to create three separate tailored messages to the author, the TSMs and the SMEs. When the draft DOE Technical Standard being posted is going to be invoked in a DOE Directive, the TSP notifies the Directives Review Board. This may be done using a cross platform (TSP RevCom – Directives RevCom) notification process. Additionally, a statement is included in the TSP RevCom notification message to identify the invoking Directive.
- Launch the review process to open the document for comment and send the notifications.

3.2.3 Assign Delegates and SMEs (TSMs)

Delegates

TSMs have the option of delegating authorities and functions to another person for a particular document. Delegates have essentially the same privileges and authorities in the TSP RevCom process as the TSM.

Reasons for delegation can include (but are not limited to):

- The TSM will be absent during a critical part of the review.
- The TSM wants to defer the coordination and sorting of comments to someone with technical expertise in the area of the standard. For example, the members of the hoisting and rigging topical committee in each office, laboratory, or site office typically sort and coordinate incoming comments from their organizations for the hoisting and rigging standard.
- The TSM needs to share the workload.

SMEs

TSMs and their delegates can assign specific SMEs through the TSP RevCom process. Once an SME is assigned, the TSP RevCom process will automatically alert the SME that the standard is available for review. The TSP RevCom process can also be used to let the assigned SMEs know when there are changes to their schedules.

Initially, the TSM or the delegate needs to set up an account for each SME. Setting up the account involves providing information such as the email address and organization for the SME. Once an account has been established, the TSM may assign the SME to subsequent documents on the same account. When a SME is no longer part of the organization, the TSM should remove the SME from the SME listing.

3.2.4 Reset Due Dates - Notify Delegates and SMEs of Dates (TSMs). When the TSP launches a document for review, TSP RevCom sets the due date when TSMs are to submit comments to the author. At that time, TSP RevCom sets cascading default dates for subordinate organizations (delegates, subordinate TSMs, SMEs). The cascading dates allow time for the TSMs to consolidate and sort the comments before submitting them to the author. The TSMs can reset the SME and delegate due dates up to the date the comments are due to the author. TSMs cannot change the date that comments are due to the author. Only the TSP administrators can change that date. Each time a TSM changes a due date, TSP RevCom provides an opportunity to notify the affected delegates, subordinate TSMs, and SMEs.

3.2.5 Enter Comments in TSP RevCom (Reviewers). The reviewer may comment on each section of the draft standard and provide any overall comments that apply to the document in general. The reviewer must formally “submit” comments in TSP RevCom before the next level can view the comments. TSP RevCom allows each reviewer to submit multiple comments to a single section.

The TSP will also post the document in an unparsed version to allow reviewers to download and/or print the draft standard and read it before commenting on it. If the document is very large, as is the case with some of our handbooks, the TSP may post the document in multiple files to make it easier to download the document with slower internet connections.

The following sections outline the steps for the SMEs, the TSM, and the delegates to enter and submit comments on TSP RevCom.

Logging on to TSP RevCom

Log on to TSP RevCom at <http://standards.doe.gov/login.jsp>. Administrators, authors, TSMs, and delegates require logon IDs and password. Contact the TSP at TechStdPgm@hq.doe.gov to obtain them. SMEs do not need passwords to log on.

Selecting a Document

After logging on, a list of documents will appear in three categories:

- Open for comment;
- Closed, comment resolution; and,
- Open for concurrence.

Select the version for comment. Reviewers can only enter comments on documents listed as “open for comment.”

Reading the Draft Standard and Entering Comments

After selecting a document version, TSP RevCom will display a *Comment Entry* screen. From that screen, select the whole version of the draft standard to view or print before making comments or select a section of the document and read each section and begin entering comments. When selecting a section, a screen will pop up with the text of that section. To comment on that section, move or reduce the pop up with the text so that the button that says “add comments” is visible. Click on “add comments” and a comment entry box will appear on the bottom with the words “Here is my comment.” Type comments into that section and select whether the comment is essential or suggested. TSP RevCom will generally default to “essential.” When finished, click on the “Save” button. Saving comments does not submit them.

Reviewers do not need to comment on sections in order. Provided comments have been “saved,” reviewers can logout and return later to continue working on comments up until the due date. After the due date, reviewers are not able to enter, save, or submit comments, so be certain to submit comment packages before the due date.

Reviewers can also click on the “no comments” button if they have no comments, and then formally “submit” the package with no comments.

TSMs enter comments the same way as SMEs, but TSMs should not “submit” their packages to the author until they have completed coordination of comments with their subordinate reviewers.

NOTE: Reviewers should click on save every few minutes or the process will timeout and the comments that were not saved will be lost. Reviewers can go back and change saved information later before submitting the package.

Comment Types

Comments are designated as either "essential" or "suggested."

- Essential comments. For a comment to be considered "essential", it must be such that the comment, if not addressed, would make the document technically unacceptable to the organization. The Reviewing Activity must clearly justify essential comments and propose a solution.
- Suggested comments. Suggested comments include editorial changes, questions, general observations, and suggestions for improvement. Typically, the majority of comments are "suggested." The Reviewing Activity should clearly state on the comment sheet the change to the document that would be necessary to resolve the comment.

3.2.6 Submit the Package to the TSM (Reviewers). When reviewers are finished with comments, they must submit their comments to the TSM (or delegate). To submit a package, click on "Version" on the top toolbar, and then click on "Submit Package." A message should appear at the top of the page confirming that the package has been submitted.

Comments are "submitted" through each level to the author before the author can respond to them.

3.2.7 Select and Edit SME Comments (TSMs). TSMs and delegates log in and select a document (see above *Logging in and Selecting a Document*) and go to the *Comment Entry* screen. When the TSM (or delegate) opens a section for comment, two or three sub-areas appear:

- the first is for TSMs (or delegates) to make their own comments;
- the second contains comments from subordinate SMEs and delegates; and,
- the third contains comments from subordinate TSMs if applicable (no section appears if this is not applicable).

The reviewer's name and organization and the date the comment was submitted appear with the comment. In addition, each comment has a check box that the TSM (or delegate) can use to select (or, in the case of a delegate, recommend) comments. If the TSM has used a delegate, the comment also includes the check boxes indicating whether the delegate has recommended the comment for inclusion. Only comments that the TSM selects are forwarded to the next level.

Accept or redesignate each comment as essential or suggested.

Work on the package, log off and return to work on it some more until the due date, but the comments must be formally submitted to the author before the due date or TSP RevCom will not accept the package.

The TSM must ensure that the consolidated set of comments is internally consistent and supported by the organization's management. The TSM should provide feedback to SMEs on disposition of their comments.

- 3.2.8 Submit the Package to the Author (TSMs). Once the TSM has selected the comments to go forward and added any new comments, the package must be formally submitted to the author before the author can view the comments. To submit a package, click on "Version" on the top toolbar, then click on "Submit Package." A message should appear confirming that the package has been submitted.
- 3.2.9 Comments After the Established Review Period. On occasion, a TSM may miss or forget a due date. If the author believes that comments from a particular organization are important to the quality or integrity of the document, the author should pursue the comments as the due date approaches and may request the TSP to authorize a targeted, limited reopening of TSP RevCom.

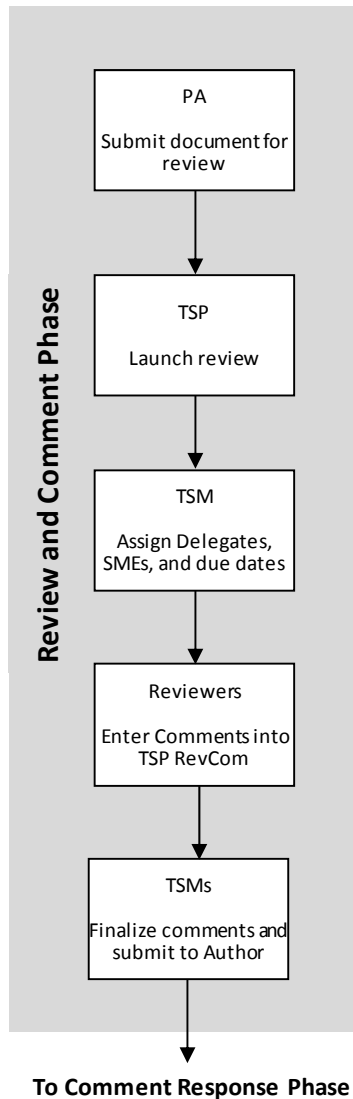


Figure 2. Coordination Process: Review and Comment Phase

3.3 Comment Response Phase

The Preparing Activity must satisfactorily resolve all essential comments with the comment originator. A DOE Technical Standard with unresolved essential comments will not be published.

- 3.3.1 Resolving Essential Comments. Resolution of comments is the responsibility of the Preparing Activity. Essential comments may be resolved in one of the following ways:
- a. The Preparing Activity may accept the comment and incorporate it into the document as written.
 - b. The Preparing Activity may accept the comment with modification.
 - c. The Preparing Activity may reject the comment and provide a basis for comment rejection.
 - d. If the essential comment does not meet the requirements of Section 3.2.5 of this Procedure, the Preparing Activity may downgrade the comment from "essential" to "suggested" and treat the comment as "suggested."
- 3.3.2 Considering Suggested Comments. Suggested comments do not require resolution prior to approval of the document; however, they are to be considered. The Preparing Activity should provide dispositions for all suggested comments.
- 3.3.3 Responding via TSP RevCom. TSP RevCom provides the Preparing Activity (author) an electronic means to accept or reject comments. After selecting the document, select a section within the document to begin work. Authors do not need to respond to comments in order. Provided responses have been "saved", authors can logout and return later to continue working on responses up until the due date. After the due date, authors will not be able to continue to respond unless the TSP manager or delegate agrees to and resets the due date for the responses to the document in TSP RevCom.

To enter a response, click on the "add response" button to the right of the comment. Type the response and click on "Save."

When viewing comments, TSP RevCom will open the display with the "essential comments." To switch to viewing and responding to suggested comments, click on "suggested comments." When in the suggested comments field, click on "essential comments" to switch to essential comments.

When dispositions have been prepared for all comments and entered into TSP RevCom, the Preparing Activity should prepare and submit a Response Package which consists of the following: (1) a redline strike out revision of the draft standard showing changes to the original draft provided for DOE wide review and comment; and (2) a clean version of the draft standard. To submit the Response Package and send it to the Review Activities, click on "Version" at the top of the page, then "Submit Package," then "Submit."

Use the “Notify” button to notify the reviewers that their comments have been responded to.

3.4 Response Negotiation Phase

Once the Preparing Activity (author) submits the “Response Package,” a 30-day clock is started for response negotiation. The Reviewing Activities (TSMs and SMEs) may use TSP RevCom to review the author’s responses using the “Reports” button at the top and building a custom report with the response to comments. The TSMs should notify SMEs who provided comments and obtain their feedback.

During this 30-day period the Reviewing Activities have the opportunity to review the Response Package and to discuss the author’s resolution of their comments with the author. The Reviewing Activities should provide feedback within the 30-day period on any essential comments that are not resolved to their satisfaction in coordination with the PSO TSM.

If an essential comment cannot be resolved between the author and the commenter, the responsible senior line manager (SLM) of the Preparing Activity and the Technical Standards Program Manager should get involved to facilitate resolution of any outstanding issues. This may include steps such as discussions between the Preparing Activity and Reviewing Activity; review by immediate Preparing Activity and Reviewing Activity managers; technical arbitration by subject matter experts (such as DOE Topical Committees or ad-hoc committees established by the Technical Standards Program Manager) or the Technical Standards Managers’ Committee; and escalation to successively higher levels of management. Technical resolution accepted by the comment originator’s immediate line manager (or higher) constitutes acceptable resolution of an “essential” (or other) comment.

If resolution of the comments results in substantive change to the document, the Preparing Activity, with concurrence of the project’s supporting TSM, should redraft the document and resubmit it through TSP RevCom for another coordination review, with the coordination time set commensurate with the degree of changes.

3.5 Concurrence Phase

At the end of the Response Negotiation Phase, the Preparing Activity (author) prepares a redline strikeout (RLSO) version of the draft DOE Technical Standard which identifies the modifications made to the document after the incorporation of comment resolutions. The RLSO and clean versions are posted in TSP RevCom for a period of 10-days to allow the Reviewing Activities (SMEs and TSMs) a final look at the draft DOE Technical Standard prior to it becoming an approved DOE Technical Standard.

The Preparing Activity must resolve all non-concurrences received from the DOE HQ Program Office TSMs before the DOE Technical Standard may be approved. Where non-concurrences cannot be resolved with TSMs, a dispute resolution process will be used where the non-concurrence issues are elevated to the responsible SLMs. When non-concurrences cannot be resolved by the responsible SLMs, the non-concurrence issues are elevated to the Deputy Secretary or designee for resolution.

When the draft DOE Technical Standard being posted in TSP RevCom is going to be invoked in a DOE Directive, the TSP notifies the Directives Review Board. DOE Directives that invoke DOE Technical Standards as required methods are governed by DOE Order 251.1C, Departmental Directives Program, and the DRB is interested in the content of such invoked technical standards. Prior to approval of a Technical Standard that will be invoked by a DOE Directive, the Preparing Activity and, when appropriate, the Office of Primary Interest responsible for the DOE Directive, will provide the Technical Standard to the DRB for its review. If a Technical Standard is to be invoked in a DOE Directive, then the DRB must concur on it being invoked. If the DRB has concerns with the Technical Standard that would prevent the DRB from concurring on the invoking Directive, these concerns must be resolved before it will be invoked. When non-concurrences cannot be resolved with the DRB, the non-concurrence issues are elevated to the Deputy Secretary or designee for resolution.

For the purpose of DOE Technical Standards concurrence, a non-vote or an abstention will be taken as a concurrence.

Figure 3 provides a flow chart for the comment response, response negotiation, and concurrence phases of the coordination process.

From Review and Comment Phase

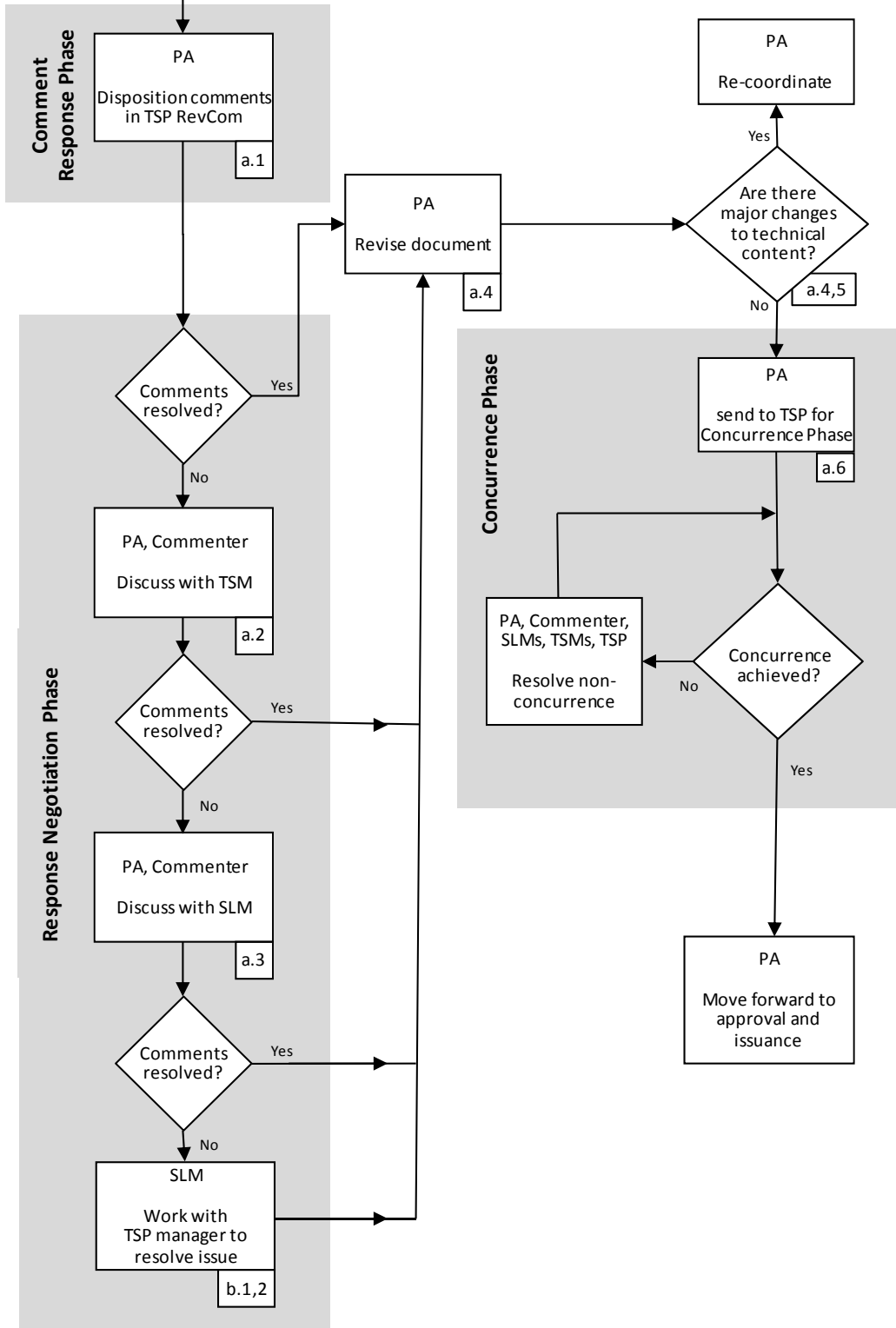


Figure 3. Coordination Process: Comment Response, Response Negotiation, and Concurrency Phase

Figure 3 Legend	
Person(s) Responsible	Action
a. Preparing Activity	<ol style="list-style-type: none"> 1. Prepare comment dispositions and enter them into TSP RevCom. 2. Address unresolved essential comments with the Review Activity's TSM and the commenting individual or organization. <p>Note: PSO TSMs should be aware as to what is the proposed resolution and agree to it.</p> <ol style="list-style-type: none"> 3. If any essential comments still cannot be resolved, work with the senior line manager of the Preparing Activity to reach conclusion. 4. Incorporate all resolutions into the DOE Technical Standard. 5. If resolution of the comments requires substantive change to the document, the Preparing Activity, with concurrence of the project's supporting TSM, should redraft the document and resubmit it through TSP RevCom for another review. 6. Submit the document for concurrence.
b. Senior Line Manager for the Preparing Activity	<ol style="list-style-type: none"> 1. Review all information and attempt to resolve remaining issues. 2. If there are still problems or unresolved essential comments, work with the Technical Standards Program Manager to resolve the issue.

**ATTACHMENT A
SAMPLE COORDINATION MEMORANDUM**

Date

Distribution

Proposed [New] [Revision to] [DOE-(STD, HDBK, SPEC)-XXXX-YR], [Full Title of New Document or of Old Document Being Revised], Project Number [XXXX-XXXX]

The referenced technical standard is approved for distribution for review and comment on TSP RevCom at <http://www.hss.energy.gov/nuclearsafety/techstds/>. After comments have been resolved, the document will be approved as a DOE [standard] [handbook] [specification]. This document is submitted for [full] [limited] coordination.

The preparer and point of contact for this document is [Mr./Ms./Dr. _____] in [DOE Headquarters office], She [or he] can be reached at [phone/fax numbers] or [e-mail address].

In addition to the standard list of Technical Standard Managers, notification of the availability of this document should be provided to: [list of specific DOE topical committee chairpersons], [list of specific subject matter experts and their email addresses], and [the Assistant Secretary of the Office of Primary Interest if it is an office other than that of the author].

[Optional] Please enter the following survey questions on TSP RevCom when the standard is distributed for review and comment:

- [survey question 1]
- [survey question 2]

As a [full] [limited] coordination standard, the comment period should be the standard [60] [30] days. OR Because of the following special circumstances, we request that the Technical Standard Program Manager shorten the comment period to [number] days: [enter urgent circumstances including significant safety urgency, national security emergency, major external or internal commitment or other. The shorter schedule should be discussed and agreed to by the TSP manager before this memorandum is issued.]

[HSS Mandatory Statement] In keeping with HSS policy, this draft standard has been reviewed by the appropriate HSS organizations and is approved for posting in TSP RevCom. _____ Initial

An electronic copy of the draft subject technical standard is being provided concurrently with this memorandum. We understand that the comment period for this document will not begin until the document is posted and available on TSP RevCom.

Sincerely,

[Name, title, and routing symbol of the responsible DOE Senior Line Manager]

Attachment