

## EFCOG Best Practice #82

**Best Practice Title:** Safety Basis Supplement

**Facility:** Multiple Sites

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**Brief Description of Best Practice:** The Safety Basis Supplement (SBS) provides an efficient mechanism for temporarily revising safety basis documentation, i.e., the documented safety analysis (DSA) and technical safety requirements (TSR) to support a planned activity or evolution that introduces temporary conditions into a facility that the original safety basis documentation or hazard controls were not developed to support. DOE review and approval of the SBS assures that appropriate regulatory oversight is maintained. The SBS White Paper details the application, development, implementation, and management of the SBS.

**Why the best practice was used:** The SBS was formally referred to as a Justification for Continued Operations (JCO). The use of a JCO was determined to be acceptable for unplanned situations resulting from a potentially inadequate safety analysis (PISA) leading to an Unreviewed Safety Question (USQ). Outside of a PISA/USQ situation, the use of a JCO was deemed inappropriate. For a planned activity, additional rigor is necessary, and this is built in to the SDS.

**What are the benefits of the best practice:** The process of development, review and approval, implementation, and eventual retirement of an SBS is much more efficient than the process of revising the DSA and TSR documentation, getting it reviewed and approved, implemented, then repeating the process when the temporary activity or evolution has been completed. Not only are there fewer process steps, each one can be executed more efficiently.

**What problems/issues were associated with the best practice:** The SBS White Paper describes necessary considerations and constraints in using the SBS for temporary activities.

**How the success of the Best Practice was measured:** Use of the SBS is measured in terms of reducing cycle time in safety basis revision, implementation, and management. Site specific data may be requested via the POC.

**Description of process experience using the Best Practice:** See Benefits above. Site specific data may be requested via the POC.