



Implementation of DOE O 433.1B

John Fredlund

Los Alamos Site Office

Nuclear Facility Maintenance Program Oversight



The Requirements for Implementation

Paragraph 4.g of the **Order** requires:

Full implementation of the requirements in this Order must be accomplished within 1 year of its issuance, unless a different implementation schedule is approved by the SO with concurrence of the CTA.

Paragraph 1.j of the **CRD** requires:

These requirements will be fully implemented within 1 year of its issuance, unless a different implementation schedule is approved by the SO with concurrence of the CTA



The Requirements to be Implemented

Heavily edited and paraphrased

- 1. Develop & implement a documented NMMP that clearly addresses integration and elements of maintenance**
- 2. Implement the NMMP through approved documents, with a manual or set of procedures**
- 3. NMMP identified in DSA, changes reviewed under USQ process**
- 4. Conduct all maintenance in compliance with NMMP**
- 5. Triennial assessments by federal and contractor organizations**

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Can Fully Implemented by construed as:

- All order requirements, all commitments in the NMMP, and all implementing procedures have been reviewed and are impeccable?
- Performance to NMMP and implementing procedures is considered impeccable?
- Performance to NMMP and implementing procedures has been thoroughly assessed with no issues identified?

Probably not.

One Question to Take Back



Is maintenance on SSCs that are owned/operated/maintained by program personnel performed under the NMMP?

Proposed Steps to Implementation



- **NMMP document approved by site office that identifies how elements of maintenance are implemented through existing processes and how nuclear facility maintenance is integrated with related programs.**
- **Existing processes are reviewed and determined to adequately achieve objectives of each element and to control integration with related programs.**
- **DSAs (TSRs??) commit to the NMMP as the SMP for maintenance.**
- **Feedback & Improvement is achieved through performance-based assessments & issues management.**