

NNSA ISSUES WITH 10 CFR 851

- Need Standard Review Plan Approach for all 851 Submittals to Ensure Consistency across DOE
- Need to Address Exemption Process versus proposed Rule Variance Submittal and Processing
- Need Clear Milestones for Forecasted EH Deliverables and Contractor Submittals
- Need NTS Threshold Reporting Levels and HQ Level Reporting Procedures
 - Delays will significantly Impact NNSA Contractors
 - Some DOE Locations/Contractors Currently not under PAAA Reporting Structure