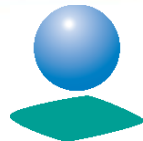


# The Safety Basis Supplement



**EFCOG SAWG**  
**Working Group Meeting**  
**Albuquerque, NM**

November 7, 2007



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# Regulatory Basis

- There is no explicit regulatory basis in DOE for a temporary change. However, the proposed process is consistent with 10 CFR 830
- The Safety Basis Supplement is identified in DOE-G 421.1-2



# Overview of Process

- The use of a Supplemental Safety Basis (SBS) must be planned
- The proposed change is temporary and limited to specific conditions
- The safety analysis and supporting documentation is consistent in level of information/rigor as the approved safety basis
- This level of rigor may be achieved by substituting conservative controls for otherwise difficult to perform safety analyses
- Requires specific approval by DOE and verification of implementation **prior** to entry into alternate configuration
- Previously authorized configuration restored once temporary activity is complete



# Attributes of SBS

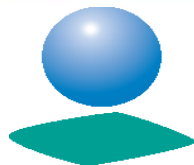
- It is appropriate to use an SBS if the change is temporary in nature, cannot be performed in compliance with the currently approved safety basis without expansion, and can be made safely by applying conservative controls
  - Decommissioning activities
  - Modification of existing facility
  - Temporary mission support



# Attributes of SBS (cont.)



- The activity is limited in scope and duration
  - The evolution allowed by the SBS is short in duration
  - The activity is well defined, is demonstrated to be safe with the controls established, and ends with the normal safety basis restored
  - The activity is performed once and therefore does not warrant a permanent revision to the safety basis which would need to be undone afterwards



# Attributes of SBS (cont.)

- The SBS is proposed to be a recognized form of safety basis documentation
  - Prepared using approved site procedures
  - Meets requirements of other safety basis documents in that it must include:
    - Description of authorized activities and affected equipment/facilities
    - Evaluation of hazard
    - Identification of appropriate controls
    - Evaluation of the safety significance of the situation



# Limitations of SBS

- May never be used to authorize long term activities or “permanent” modifications
- May never be used to address recurring conditions in lieu of a permanent document change
- Does not allow an unevaluated activity
- Expiration date is specified



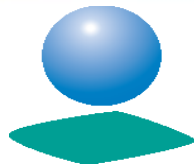
# Advantages of SBS

- Significantly reduces time and cost to develop, approve, and implement DSA for a limited activity where conservative controls can obviate the need for rigorous analyses of conditions that might otherwise exist
- Uses a standard set of expectations for the evaluation and authorization of hazardous work activities
- TSR controls adjusted to address the specific hazards/conditions present
- Ensures unique activities are properly controlled
- Ensures the safety basis remains current during all stages of the evolution as required by 10 CFR 830
- Limits the time temporary condition is allowed to exist



# Conclusion

- Appropriately applied the SBS provides a valuable tool that can be used to address planned, what would otherwise be non-compliant conditions in a sensible manner, without invoking a bureaucratic process of authorization for temporary change
- Allows DOE approval of limited increase in risk bounded by controls for a truly temporary condition
- Ensures temporary actions are authorized appropriately and performed safely



# Process

Draft White Paper developed and distributed to small working group:

Paula Ostby

Andrew Vincent

Brad Evans

Jerry Hanson

David Renfro

Mark Mitchell

JT Beard

Donna Busche

Jim McCormick

Steve Additon



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# Process (cont.)

- Comments were focused on
  - clear expression of the status of the existing safety basis and characterization of the proposed work as an “extension” of the existing safety basis
  - conduct of operations concerns with implementation of alternate controls (TSR)s
  - better develop the basis for modification of TSRs
  - tie clearly to the elements of 10 CFR 830
  - provide more detail in description of format
  - collect examples that may illustrate the product



# Process (cont.)

- Provided revised paper to SAWG steering committee
  - Additional issue raised with respect to AA
  - LANL has process approved for consideration
- Presentation here – your feedback is requested
- NEXT STEPS.....

