



**10CFR830 Subpart B  
Exemption Process Status and  
Lessons Learned**

*Presented to the EFCOG SAWG*

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January 2003

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**Current Status** 

*See Attached File*

Y2010 Slide Review  
Sept. 2010

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**Process -10CFR820  
(Background)** 

- Legal Basis
- Demonstrated Need
- Technical Adequacy
- Conditions Adequate
- Logical Flow to Decision

Y2010 Slide Review  
Sept. 2010

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**Beckner Ltr (August 9, '02)** 

- Noted Numerous DSAs for NNSA Facilities Incomplete
- Encouraged Early Review/Early Exemption Requests
- Offered CTG Service
- Highlighted Key 10CFR820.62 Criteria for Exemption Approval
  - Must be consistent w/DOE requirements for safe operations
  - No undue risk to workers, public, or environment

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 **Areas of Concern** 

- These are areas where the exemption requests have fallen short of expectations required for approval at the Beckner Level.
  - Justification of current adequacy of interim SB
  - Evidence of good-faith efforts to comply
  - Justification of exemption date.

Y901 (Exemption) Revision  
April 2002



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 **Current AB Adequacy** 

- Define guidance used to prepare current/interim
  - BIO - std 3011, other
- DOE Approval/SER
- Update and Change Control in accordance with DOE Approved USQD processes.

Y901 (Exemption) Revision  
April 2002



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 **Good-Faith Efforts** 

- Progress - demonstrated measurably
- Concrete Reasons for Delay
- Why these were not overcome (since 2000)

Y901 (Exemption) Revision  
April 2002

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 **New Date...** 

Why is this the right date? Must show -

1. Measurable Progress toward completion
2. Understood Path-forward

Integration of 1 & 2 for logical conclusion of exemption request date.

Y901 (Exemption) Revision  
April 2002

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