

DOE-STD-
3007/3009

Integration

EFCOG SAWG Workshop
October 20-21, 2009

Agenda

- ✿ Overview of DOE-STD-3007/3009
- ✿ Presentation of Identified Issues
- ✿ Path Forward

Identified Issues

Issue	Strategy
Inappropriate Requirements: Inclusion of DSA requirements/expectations in NCSE Standard	Recommend removal of this type of information from NCSE standard and place any needed expectations in appropriate DSA, TSR or USQ guidance document
Inconsistent requirements: DOE 3007 & ANS-8.1 definitions of Double Contingency Principle	Define criteria for DOE approval of NCS evaluation

Identified Issues

Issue	Strategy
<p>Insufficient guidance: elevating NCS controls into DSA & TSR:</p> <ul style="list-style-type: none">◆ single contingent controls◆ admin program vs SAC◆ allowance for shielding◆ consideration for unmitigated frequency◆ criterion for active controls requiring calibration provides no relief◆ criteria for elevating NCS controls to DSA confusing	<p>Re-write guidance and place needed expectations in appropriate DSA, TSR or USQ guidance document</p>

Identified Issues

Issue	Strategy
<p>Insufficient guidance: DOE approval process for DCP deviations:</p> <ul style="list-style-type: none">◆ Back fitting DCP deviation approval◆ Change control process for proposed DCP deviations	<p>Establish proper criteria to select NCS controls and elevate them to a DOE approved DSA/TSR based on real risk with specific operations. The department should be able to accomplish its goal to review/approve controls associated with elevated inadvertent criticality risks and there is no need to have the requirement to approve DCP deviations.</p>

Path Forward

- ✦ Draft EFCOG request to members to support efforts of a writing group
- ✦ Establish writing group and draft initial changes to guidance documents for review and comment
- ✦ Incorporate NCS Community in review process