

**PRICE-ANDERSON AMENDMENTS ACT (PAAA) WORKING GROUP
CY 01 ANNUAL REPORT TO THE DIRECTORS
April 24, 2002**

I. Purpose

The EFCOG Price-Anderson Amendments Act (PAAA) Working Group is a Department of Energy (DOE) contractor working committee whose purposes are (a) to provide a regulatory affairs forum for DOE contractors that facilitates DOE and contractor objectives concerning all aspects of the nuclear safety regulations embodied in the PAAA Rules, and (b) to promote excellence at DOE facilities through cost-effective implementation of these nuclear safety regulations by sharing of information and lessons learned.

II. Membership

The PAAA Working Group consists of approximately 70 people representing 25 EFCOG member companies and 8 non-member companies. The organizational structure consists of a Chairman, a Vice-Chairman, and a Strategic Planning Committee (SPC) consisting of three other members appointed by the EFCOG Sponsoring Director. The names and company affiliations of the individuals currently filling these positions are listed below.

Chairman:	Abel A. Garcia (LLNL)	term expires 12/31/02
Vice-Chairman:	William L. Luce (WSRC)	term expires 12/31/02
SPC Member:	Stephen J. Ward (SNL)	term expires 12/31/02
SPC Member:	Richard A. Hughes (BHI)	term expires 12/31/02
SPC Member:	Adam B. Cohen (ANL-E)	term expires 12/31/03

All six positions have renewable terms of two years and constitute the full Working Group SPC assigned by the EFCOG Executive Director.

The Sponsoring EFCOG Executive Director is Robert Pedde (WSRC), and the DOE Sponsor is Keith Christopher, Director, Office of Price-Anderson Enforcement (DOE-OE).

The Working Group membership includes representatives from a broad range of DOE prime and sub-tier Contractors that cover all major DOE sites. Participation in Working Group activities is not limited to representatives from EFCOG member companies. Each participating DOE contractor organization may identify one or more representatives, as appropriate, to facilitate communications within their organization. Contractor management personnel and subject matter experts, and other non-Working Group members from DOE contractor organizations are welcome to attend as guests and encouraged to participate in Working Group meetings and Task Team initiatives. Participation of these guests provides Working Group members with direct access to subject matter experts in various areas of interest, e.g., procurement, transportation, radiation protection,

and quality control. It also provides the guests an opportunity to interact with DOE-OE and a large number of Contractor PAAA Coordinators with substantial expertise and practical experience in the PAAA process.

- On December 13, 2001, EFCOG Executive Directors approved recommendation of PAAA Working Group Sponsoring Director Bob Pedde concerning Working Group Officers and Strategic Planning Committee
 - Abel Garcia (LLNL) will continue as Chair during 2002
 - Bill Luce (WSRC) will continue as Vice-Chair during 2002
 - Adam Cohen (ANL-E) appointed to the Strategic Planning Committee

III. Status

Calendar Year 2001 Input

The PAAA Working Group conducts meetings semiannually, generally in the Spring and Fall, or as determined by the Working Group Chair; the SPC meets in conjunction these meetings.

At the Spring 2002 meeting, it was agreed to hold future Fall meetings at DOE contractor facilities and Spring meetings in Las Vegas. The principal driver for this change is to allow greater participation by both DOE and contractor management and operations personnel at the various sites.

The cost of meetings is covered by the meeting host to the extent authorized by the host's contractual arrangements with DOE and applicable DOE Directives. Contractors are expected to fund the costs of their respective attendees at meetings. No formal cost-benefit analyses has been performed by the PAAA Working Group to date because the cost-avoidance benefits from these activities is not directly or easily measurable.

The PAAA Working Group held two meetings in Las Vegas, Nevada during Calendar Year 2001:

- Spring 2001; was hosted by Rick Saval, Bechtel Nevada and held at the Bechtel Nevada Facility during March 28-29, 2001. There were approximately 100 attendees.
- Winter 2001; was hosted by Charley Watts, LLNL Nevada Test Site and held at the DOE Nevada Support Facility during November 29-30, 2001. There were approximately 90 attendees.

Both meetings were attended by Keith Christopher, Director of the DOE-OE and sponsor of the PAAA Working Group; and Dick Black, Director of the DOE Office of Nuclear & Facility Safety Policy (DOE-EH-53).

Other accomplishments during calendar year 2001 include the following:

- Provided comments to DOE-OE on proposed EGS concerning enforcement of management and independent assessments; subsequently issued by DOE-OE on December 17, 2001 as EGS 01-02, *Management and Independent Assessment*.
- Provided comments to DOE-OE on proposed EGS concerning enforcement of weapons-related PAAA noncompliances; subsequently issued by DOE-OE on October 15, 2001 as EGS 01-01, *Nuclear Weapon Program Enforcement Issues*.
- Provided comments to DOE-OE on proposed EGS concerning enforcement of bioassay accreditation; subsequently issued by DOE-OE on February 21, 2002 as EGS 02-01, *Enforcement Position Relative to 10 CFR 835 Bioassay Accreditation*.
- Significant participation in development of proposed NNSA draft policy document concerning weapons issues subject to 10 CFR 830, Subpart A, *Quality Assurance*. NNSA-AL has transmitted the draft policy to NNSA-HQ for final review.
- On December 13, 2001, EFCOG Executive Directors approved recommendation of PAAA Working Group Sponsoring Director Bob Pedde concerning Working Group Officers and Strategic Planning Committee:
 - Abel Garcia (LLNL) will continue as Chair during 2002
 - Bill Luce (WSRC) will continue as Vice-Chair during 2002
 - Adam Cohen (ANL-E) appointed to the Strategic Planning Committee
- EFCOG PAAA Working Group Repetitive and Programmatic Issues Task Team working with DOE-OE to clarify the differences between noncompliances and quality improvement.
- PAAA Training Task Team completed draft of revised PAAA training module; working with Contractor Procurement Council on PAAA training module for procurement personnel.

Other completed activities for calendar year 2001 include the meetings listed below, which were attended by various PAAA Working Group members, as indicated:

- January 9, 2001, meeting with Contractor Procurement Council regarding PAAA Training; attended by Abel Garcia, PAAA Working Group Chair, and Mike Walls, Procurement Task Team Leader.
- March 8-9, 2001, meeting with DOE DP & EH regarding 10 CFR 830, Subpart A, *Quality Assurance*, which focused primarily on the impact of the removal of the weapons exemption; attended by Abel Garcia, Steve Ward, Al Elliott, and many others.
- It is also noted that all four Task Teams held various teleconferences and meetings, as necessary, to accomplish their goals. Several of these meetings were held in conjunction with the regular Working Group meetings in order to minimize costs.

Calendar Year 2002 Activities

- The Spring 2002 meeting was hosted by Charley Watts, LLNL Nevada Test Site and held at the U.S. DOE North Las Vegas Facility during April 2-4, 2002. There were approximately 60 attendees.
- The PAAA Working Group will return to a rotation schedule for Fall Working Group meetings; the Fall 2002 meeting will be hosted by Lawrence Berkeley National Laboratory.
- Graded Approach Task Team completed Final Draft of implementation guidance document. On April 15, 2002, the Final Draft was distributed for review by all EFCOG Working Groups. Comments are due June 1, 2002.
- Continue active engagement in 10 CFR 830 Rule implementation:
 - Weapons EGS: DOE-OE, DOE-AL, and various contractors
 - PAAA training: Contractor Procurement Council
 - Subpart A (QA): DOE QA Working Group and QSM SIG
- Continue working relationships with:
 - Radiation Protection Task Group of EFCOG ISM Working Group
 - DOE Contractor Procurement Council
 - TRADE QSM Special Interest Group
- Provide comments to DOE-OE on documents as requested.
- Establish new Subgroups and/or additional Task Teams as appropriate.

IV. Subgroups' Status

There are no active subgroups at this time. The current status of Task Teams is shown in the table below. Task Teams are created, as necessary, by the Working Group Chair with the advice of the SPC. These teams operate under the general guidance of an sponsoring SPC member to ensure appropriate focus on effectiveness and deliverables.

<u>Task Team Name</u>	<u>Sponsoring SPC Member</u>	<u>Date Formed</u>	<u>Team Leader</u>
Procurement	Abel Garcia	10/00	Mike Walls, ORNL
Graded Approach	Bill Luce	12/99	Brinley Varchol, Fernald
PAAA Training	Steve Ward	10/00	Dick Steele, SNL
Repetitive and Programmatic Issues	Bill Luce	12/00	Bill Luce, WSRC

All four Task Team Leaders described the current status of their activities to the SPC and the Working Group at the Spring 2002 meeting.

On April 15, 2002, the Graded Approach Task Team issued a request to other EFCOG Working Group Chairs to provide comments on their final draft

“Implementing the Graded Approach at Department of Energy Facilities” document. Comments on the document are due to Brinley Varchol by June 1, 2002.

V. Lessons Learned

General reductions in contractor budgets for travel and potential impacts of the DOE Order on travel and conference policies continues to adversely affect the ability of PAAA Working Group members to attend Working Group meetings.

Sharing of PAAA lessons-learned information has value. PAAA Working Group activities continue to be of substantial interest to the contractor community and to DOE.

VI. Recommendations

The PAAA Working Group Chair, with concurrence of the SPC, recommends continuation of the PAAA Working Group and the four existing Task Teams.