

**EFCOG PRICE-ANDERSON AMENDMENTS ACT (PAAA) WORKING GROUP  
ANNUAL REPORT  
March 1, 2004**

**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 12/31/04
Vice-Chairman:	William L. Luce (WSRC)	term expires 12/31/04
SPC Member:	Ronald J. Simonton (SNL)	term expires 12/31/04
SPC Member:	Richard A. Hughes (BHI)	term expires 12/31/04
SPC Member:	Adam B. Cohen (ANL-E)	term expires 12/31/03

All five positions have renewable terms of two years and constitute the full Working Group SPC assigned by the Sponsoring EFCOG Executive Director. During 2003, Ron Simonton replaced Steve Ward as the SNL PAAA Coordinator and SPC member.

The Sponsoring EFCOG Executive Director is Robert Pedde (WSRC), and the DOE Sponsor is Steven Sohinki, 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.

### **III. Status**

#### ***Calendar Year 2003***

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 with these meetings. Prior to the end of 2000, the Working Group rotated the location of these meetings among the DOE sites. This practice was abandoned beginning in 2001 due to the impact of changes in DOE conference and travel policies, combined with reduced contractor travel budgets and the relatively high cost of travel to some DOE sites. Both meetings in 2001 and the Spring 2002 meeting were held in Las Vegas due to the relatively low travel and accommodation costs.

At the Spring 2002 meeting, a decision was made to return to a partial rotation schedule to allow greater participation by both DOE and contractor management and operations personnel at the various sites. The Working Group now holds fall meetings at DOE contractor facilities and spring meetings in Las Vegas.

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 have been performed by the PAAA Working Group to date, because the cost-avoidance benefits from these activities are not directly or easily measurable.

The PAAA Working Group held two meetings during calendar year 2003:

- Spring 2003; was hosted by Abel Garcia and Charley Watts, LLNL Nevada Test Operations, and held at the DOE North Las Vegas Facility during April 16-17, 2003. There were approximately 70 attendees.
- Fall 2003; was hosted by Adam Cohen, Argonne National Laboratory-East, and held at ANL-E during October 8-9, 2003. There were approximately 70 attendees.

Both the Spring and Fall meetings were attended by Stephen Sohinki, Director of DOE-OE and sponsor of the PAAA Working Group;

Other accomplishments during calendar year 2003 include the following:

- SPC Members and Task Team Leaders have had numerous discussions with Steve Sohinki and members of his staff on various enforcement topics.
- The Working Group received a request from Steve Sohinki, Director of DOE-OE, and provided comments on draft revision of Table 3-2 of *OE Operation Procedures* regarding specific OR categories used as criteria for reporting into NTS
- Panel discussions on current PAAA issues and problems were added to the PAAA Working Group Fall meeting agenda at the request of Steve Sohinki. The topics covered by the panels were: Performance Assessment, Extent of Condition Reviews, and Corrective Action Management.
- The Graded Approach Task Team completed disposition of all comments on the Final Draft of "Implementing the Graded Approach at Department of Energy Facilities". The final document, intended as an implementation guidance document for Contractor PAAA Coordinators and other contractor personnel, was distributed prior to the Working Group's Spring 2003 meeting, and it is available on the EFCOG PAAA web page
- Products from the recently retired task teams were placed on the EFCOG PAAA web page for information sharing across the complex. Dick Steele (SNL) provided products from the PAAA Training Task Team and Brinley Varchol (Fernald) provided products from the PAAA Graded Approach Task Team.
- PAAA Procurement Task Team completed their work and issued the results of a customer Information and Needs survey and joined the recently retired task teams.
- EFCOG PAAA Working Group Repetitive and Programmatic Issues Task Team continued working with DOE-OE to clarify the differences between noncompliances and quality improvement and related issues.
- EFCOG PAAA Working Group Assessment Programs Task Team completed Draft Revision C of a new Assessment Guide.

Other completed activities for calendar year 2003 include the meetings listed below, which were attended by various PAAA Working Group members, as indicated:

- It is noted that the Task Teams held various teleconferences and meetings, as necessary, to accomplish their goals. Several of these meetings were held in conjunction with the regular Spring and Fall Working Group meetings in order to minimize costs.

### **Calendar Year 2004 Activities**

- The Spring 2004 meeting is scheduled for April 7-8, 2004 at the DOE North Las Vegas Facility. It will be hosted by Abel Garcia, LLNL, with support from Charley Watts, LLNL Nevada Test Operations. Final arrangements are nearing completion, and a final agenda for the meeting will be available approximately March 15.
- Continue active engagement in Draft 10 CFR 851 Rule:
- Continue working relationships with:
  - Radiation Protection Task Group of EFCOG Integrated Management Working Group
  - Quality Assurance Subgroup of EFCOG Integrated Management Working 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 two 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 a 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>
Repetitive and Programmatic Issues	Bill Luce	12/00	Bill Luce, WSRC
Contractor Assessment Programs	Bill Luce	4/03	Brinley Varchol, Fernald

The Task Team Leaders described the current status of their activities to the SPC and the Working Group at the Fall 2003 meeting. As noted earlier, the Graded Approach Task Team has completed its work and was formally retired at the Spring 2003 meeting.

## **V. Lessons Learned**

Open forum discussions with Stephen Sohinki, Director of DOE-OE, on current and future PAAA program topics of interest continue to be of great value to the EFCOG PAAA Working Group.

Panel discussions on current PAAA issues and problems are effective in both disseminating information and encouraging comments from the EFCOG PAAA Working Group.

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 two Task Teams.