Department of Energy
Oak Ridge Operations
Office of Environmental Management
Procedure

UNREVIEWED SAFETY QUESTION PROCEDURE REVIEW PLAN

EM–3.4
Revision 0

Prepared: _____ Procedure Preparer — 12/3/03 Date

Approved: for _____ Assistant Manager for Environmental Management — 12/3/2003 Date

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Approved: _____ _____
Assistant Manager for Environmental Management **Date**

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Revision Log

Revision	Description of the Revision	Issue Date
0	Initial Issue-Revises and replaces previous Unreviewed Safety Question Procedure Review Plan (DOE-NSD-USQP-RP) dated July 2001 for use when reviewing EM Contractor's USQ Procedures. Changes made to DOE-NSD-USQP-RP are as follows: 1. Revised to reflect specific ORO Office of the Assistant Manager for Environmental Management authorities and responsibilities 2. Section 6.7 was revised to clarify Categorical Exclusion (CX) use and examples of CXs were added. 3. Section 6.7 was reviewed to ensure it clearly identifies that screening criteria do not contain language that requires subjective judgements. 4. Definition of Margin of Safety consistent with DOE G 424.1-1 was added to section 4.0 5. Minor editorial and format changes were made to match EM Procedure formatting requirements	12/3/2003

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1.0 PURPOSE

Section 830.203 (b) and (c) require the Department of Energy (DOE) approval of the contractor Unreviewed Safety Question (USQ) procedure. This Review Plan establishes a formal process and outlines guidance for Oak Ridge Operations Office (ORO) to conduct the procedure review.

INTRODUCTION

Section 830.203, "Unreviewed Safety Question Process," applies to all Category 1, 2 and 3 nuclear facilities. Changes, whether temporary or permanent, to a nuclear facility require application of a USQ process. The process ensures that the safety basis for a DOE nuclear facility is not undermined by changes in the facility, the work performed, the associated hazards (nuclear and non nuclear), or other factors that support the adequacy of the safety basis.

The USQ determination is not a substitute for a safety analysis; it merely serves as a benchmark for whether the safety basis is being preserved. A safety analysis may show that a proposed change is safe, yet the USQ determination may find that the change is a USQ and hence requires DOE approval prior to implementation.

Section 830.203 (c) requires DOE to approve USQ procedures for contractors with new facilities via Safety Evaluation Reports (SERs). SERs will be used to document ORO's review and approval of USQ procedures for contractors with new and existing facilities.

3.0 REFERENCES

3 10 CFR Part 830, *Nuclear Safety Management*, January 2001

3.2 DOE G 424.1-1, *Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements*, October 2001.

3.3 ORO O 420, Chapter XIII, *Safety Basis Documents Review System,* Change 1, July 24, 2002.

3.4 ORO O 420, Chapter XIV, *Delegation of Approval Authority for Safety Basis Documents* July 24, 2002.

DOE O 231 A, *Environment, Safety, and Health Reporting*, August 2003

DEFINITIONS

Graded approach means the process of ensuring that the level of analysis, documentation, and actions used to comply with a requirement are commensurate with:

The relative importance to safety, safeguards, and security;

2) The magnitude of any hazard involved;

3) The life cycle stage of a facility;

4) The programmatic mission of a facility;

5) The particular characteristics of a facility;

6) The relative importance of radiological and nonradiological hazards; and

7) Any other relevant factor.

The graded approach may **not** be used in implementing the USQ process or in implementing technical safety requirements.

Justification for Continuing Operation (JCOs) is an approval with technical justification to operate temporarily beyond the approved safety basis, analysis, or controls.

Margin of Safety is the range between two conditions. The first is the most adverse condition estimated or calculated in safety analyses to occur from an operational upset or family of related upsets. The second condition is the worst-case value known to be safe, from an engineering perspective (i.e., minimum acceptable limit for operation under normal and specific failure condition). This value would be expected to be related to the condition at which some accident prevention or mitigation action must be taken in response to the upset or accident, as required by a DOE-approved hazard control documents, not the actual predicted failure point of some component. Hazard control documents may be Technical Safety Requirements (TSRs) or they may be in another form, as permitted by 10 CFR 830.205 for certain environmental restoration activities.

Potential Inadequate Safety Analysis (PISA) means an inadequacy exists in a documented safety analysis that calls into question information relied upon for authorization of operations.

Record means a completed document or other media that provides objective evidence of an item, service, or process.

Safety basis means the documented safety analysis and hazard controls that provide reasonable assurance that a DOE nuclear facility can be operated safely in a manner that adequately protects workers, the public, and the environment.

Safety Class Structures, Systems, and Components (SC SSC) means the structures, systems, or components, including portions of process systems, whose preventive or mitigative function is necessary to limit radioactive hazardous material exposure to the public, as determined from safety analyses.

Safety Evaluation Report (SER) means the report prepared by DOE to document:

) The sufficiency of the contractor's USQ procedure;

2) The extent to which a contractor has satisfied the requirements of Subpart B of this part; and

3) The basis for approval by DOE of the USQ procedure, including any conditions for approval.

Safety Significant Structures, Systems, and Components (SS SSC) means the structures, systems, and components which are not designated as safety class structures, systems, and components, but whose preventive or mitigative function is a major contributor to defense in depth and/or worker safety as determined from safety analyses.

Unreviewed Safety Question (USQ) means a situation where:

1 The probability of the occurrence or the consequences of an accident or the malfunction of equipment important to safety previously evaluated in the documented safety analysis could be increased;

2) The possibility of an accident or malfunction of a different type than any evaluated previously in the documented safety analysis could be created;

3) A margin of safety could be reduced; or

4) The documented safety analysis may not be bounding or may be otherwise inadequate.

Unreviewed Safety Question process means the mechanism for keeping a safety basis current by reviewing potential unreviewed safety questions, reporting unreviewed safety questions to DOE, and obtaining approval from DOE prior to taking any action that involves an unreviewed safety question.

5.0 RESPONSIBILITIES

5.1 Assistant Manager

a. Ensure the contractors develop USQ procedures in accordance with 10 CFR 830.

b. Resolve comments/issues that cannot be satisfactorily resolved by the Safety Basis Team Lead.

c Ensure that SERs are developed to document the review and basis for approval of the submitted USQ procedures.

d. Ensure that SERs are properly reviewed.

Note: A technically qualified individual must review the SER. Generally, this is expected to be a qualified Senior Technical Safety Manager within the responsible line organization.

e. Approve SER and associated USQ Procedure where Approval Authority has been delegated. Otherwise, concur with recommendation for approval and recommend approval of SER and associated USQ Procedure to Approval Authority via ORO Manager.

5.2 Safety Basis Team Lead

a. Assign the reviews of contractor USQ procedures to Lead Reviewers that meet the qualification requirements specified in ORO O 420, Chapter XIII, *Safety Basis Documents Review System*.

b. Resolve comments/issues that cannot be satisfactorily resolved by the Lead Reviewer

c. Review SER for technical adequacy

d Recommend approval of SER and associated USQ procedures to the AMEM

5.3 Lead Reviewer

a. Obtains a copy of contractor USQ procedure(s) as assigned by the line Assistant Manager or designee.

b. Enlists the help of a review team, as necessary

c. Reviews the USQ procedure(s) against elements identified in Review Process below, utilizing the checksheet in Appendix A.

c. Promptly communicates comments/issues generated during the review to the contractor through the Contracting Officer's Representative (COR). Elevates areas where agreement cannot be reached to the responsible line Assistant Manager.

d Prepares SERs to document the USQ procedure reviews and the basis for their approval.

6.0 REVIEW PROCESS AND METHODOLOGY

The USQ procedures must be formally transmitted from the contractor to the responsible organization's Assistant Manager through the COR. This review plan encompasses the USQ procedure(s) delivered to DOE ORO under Section 830.203. This review plan does not include program implementation. Elements of the discussion in the sections below should be evident in the contractor USQ procedure. Although the suggested approaches provided in DOE G 424.1-1, *Implementation Guide for Use in Addressing Unreviewed Safety Question Requirements*, are not construed as requirements in appraising compliance with 10 CFR 830, this guidance does provide supplemental information regarding the rule and provides an acceptable method for implementing the requirement. A checksheet is provided in Appendix A to assist with the evaluation of the contractor USQ procedure. The Lead Reviewer may simply check the applicable "Yes" or "No" box or may choose to reference the applicable section of the contractor procedure. A "No" entry for an attribute associated with DOE G 424.1-1 does not necessarily mean that the procedure is inadequate. The completed checksheet shall contain the contractor procedure number and revision and be signed and dated by the Lead Reviewer.

6.1 ROLES AND RESPONSIBILITIES <DOE G 424.1-1, 3.1>

1) Lines of Inquiry - Does the USQ procedure discuss:

   1 Organizational roles and responsibilities related to the implementation of the program including specific responsibilities of those performing, reviewing and approving USQD?

   2 Requirements that USQ screenings and USQDs be reviewed technically by a person independent in the sense that he/she has not been involved in the preparation of the USQ documents (person does not have to be organizationally independent)?

6.2 INTEGRATION <DOE G 424.1-1, 3.1>

A Lines of Inquiry - Does the USQ procedure indicate that:

   1) The USQ process is integrated into the facility's change control processes?

   2) The change processes ensure that the USQ process is integrated into existing procedures or that new procedures are developed, as necessary and that the need for completion of a USQD is not overlooked?

3) Discussion

   The USQ process is intended to be implemented as part of a change control process that includes generalized steps for: (1) identifying and describing the temporary or permanent change, (2) technical reviews of the change, (3) management review and approval of the change, (4) implementation of the change, and (5) documenting the

change. As part of the technical reviews of a change, the contractor should perform the appropriate type of safety analysis to ascertain if the change is indeed safe. This is accomplished separately from the USQ process. The USQ process is used subsequently to determine if final approval of the change by the contractor is sufficient or if DOE approval must be obtained.

6.3 TEMPORARY OR PERMANENT CHANGES IN THE FACILITY <830.203 (d) (1)>

ines of Inquiry- Does the USQ procedure require that

Temporary and permanent changes in the facility as described in the existing Documented Safety Analysis be evaluated by USQ determinations?

2 Both temporary and permanent changes in the facility and procedures which can affect the safety analysis or the safety class or safety significant SSCs be evaluated for potential USQs?

3 Changes to SSCs that are outside the safety basis (where those changed may impact the safety analyses or the safety class or the safety significant SSCs) be evaluated for potential USQs?

4 Changes to the transportation activities which are covered by 10 CFR 830 be evaluated for potential USQs?

2) Discussion

Understanding the term "change" as it applies to modes of operation or facility processes is also important. Temporary changes to the nuclear facility should be evaluated to determine whether a USQ exists.

Changes to SSCs that are not explicitly discussed in the safety analyses should not be excluded from the USQ process, since changes to these SSCs may affect the ability of a safety SSC to perform its intended function. In addition, facility changes should be evaluated for increases in consequences to workers.

Changes in transportation activities should be evaluated via the SQ process

The necessity to distinguish between changes and routine maintenance activities is an important consideration. Routine maintenance activities (except those that are not enveloped by current analyses or that might violate a TSR) do not require review under Section 830.203.

6.4 TEMPORARY OR PERMANENT CHANGES IN THE PROCEDURES <830.203 (d) (2)>

) Lines of Inquiry – Does the USQ procedure require

1) Temporary or permanent changes in the procedures as described in the existing Documented Safety Analysis be evaluated by USQ determinations?

2. New or changes to processes involving criticality safety be evaluated for potential USQs?

2) Discussion:

Changes to procedures that are identified in the facility Documented Safety Analysis need to have a USQD prepared. However, as discussed in the screening section, some procedure changes may not require a USQD. Changes to procedures include both revising an existing procedure and creating a new procedure.

The identification of procedures may be explicit or implicit in the facility's Documented Safety Analysis. If the procedure is implied directly by the nature of a topic in the safety basis (including the TSRs), that change should be considered to be to a procedure described in the Documented Safety Analysis and a USQD performed. Such implicitly described procedures include: (1) the procedures that implement a Safety Management Program (SMP) described in the safety basis, and (2) operating, testing, surveillance, and maintenance procedures for safety equipment when that equipment is identified in the Documented Safety Analysis.

Procedures are not limited to those items specifically identified as procedure types (e.g. operating, chemistry, system, test, surveillance, and emergency plan) but could include anything described in the Documented Safety Analysis that defines or describes activities or controls over the conduct of work or actions taken. Changes to these activities or controls qualify as changes to procedures as described in the Documented Safety Analysis, and therefore must be evaluated as a potential USQ.

6.5 TESTS OR EXPERIMENTS NOT DESCRIBED IN THE EXISTING DOCUMENTED SAFETY ANALYSES <830.203 (d) (3)>

1) Lines of Inquiry – Does the USQ procedure require that:

Tests and experiments not described in the existing Documented Safety Analysis be evaluated by USQ determinations?

2) Any particular tests may be excluded from performing a USQD?

3) Discussion:

For preoperational tests, surveillance tests, functional tests, and startup tests that are performed regularly to approved procedures, USQDs are not required every time a test is performed. However, one-of-a-kind tests used to measure effectiveness of new

techniques or a new system configuration that might affect safety SSCs will require an USQD prior to being conducted. Post modification testing should be considered and included in the USQD for any modification made as a result of an experiment.

6.6 DISCOVERY OF POTENTIAL INADEQUACIES IN THE EXISTING SAFETY ANALYSES <830.203 (d) (4)>

1) Lines of Inquiry – Does the USQ procedure require that:

   1) Potential inadequacy of the Documented Safety Analysis (PISA) because the analysis potentially may not be bounding or may be otherwise inadequate be evaluated by USQ determinations?

   2) The DOE required four (4) actions are taken?

3) Discussion:

   Written USQ determinations are required when a contractor identifies a PISA that supports the DOE approved safety basis which indicates the safety analysis is not bounding. The intent is to ensure that the operations are conducted in a safe manner that is consistent with the safety basis. The Documented Safety Analysis may be inadequate for any number of reasons. In general, it is possible for a potentially inadequate analysis to arise from three entry conditions: (1) a discrepant as-found condition, (2) an operational event or incident, or (3) new information, including discovery or an error, sometimes from an external source.

   Because an inadequacy as specified above has the potential to call into question information relied on for authorization of operations, DOE requires the contractor to: **<830.203 (g)>**

   1) Take appropriate action to place or maintain the facility in a safe condition;

   2) Expeditiously notify DOE upon discovery of the information;

   3) Perform a USQ determination and submit it promptly; and

   4) Complete an evaluation of the safety of the situation and submit it to the DOE prior to removing any operational restrictions implemented to compensate for the analytical discrepancy.

   If a USQ is determined to be present, the safety evaluation will require not only DOE's review but also its approval of resulting changes, before any operational restrictions are removed.

6.7 SCREENING <DOE G 424.1-1, 3.2>

A. ines of Inquiry – NONE

B. Discussion

The purpose of USQ screening is to ascertain if it is necessary to expend the valuable time and resources necessary to perform a USQD. The USQ screening is intended to be simple Go/No-Go decision-making step, without evaluative consideration. DOE encourages the use of screening to limit the number of matters for which USQDs must be performed, provided the reasons for exclusion are documented and well supported.

Candidate items for screening include:

- Changes that involve a change to a requirement in the TSRs, or the addition of a new TSR requirement. (TSR changes must be submitted to DOE for review and approval anyway.)
- The installation of an item that is an exact replacement (i.e., same manufacturer, same model number, etc.).
- The installation of an item that is on the facility "Approved Equivalent Parts" list, for which a facility engineer has evaluated and concluded that the replacement item meets all the requirements pertinent to the specific application at the facility, including the service conditions.
- Changes for which common commercial practices would suffice, and a formal nuclear-grade change control process is not warranted (for example, changing fixtures for fluorescent lighting in an office area of the facility).
- Changes for which management has already decided will be submitted to DOE for safety review and approval.
- Changes to documents that are purely editorial and make no technical change.

Another manner in which screening criteria may be applied is through categorical exclusions (for example, different procedure types). For the purpose of illustration, certain administrative procedures may be considered. Some administrative procedures would not individually or collectively affect the facility or its operation as described or themselves be described in the Documented Safety Analysis. Therefore, there does not exist the possibility that changes to these procedures would explicitly or implicitly increase the probability or consequence of accidents or malfunctions or reduce the margin of safety. For these procedures, changes can be categorically screened out. However, whenever screening criteria are applied in this manner, a submittal to DOE should be made, including an evaluation of why a categorical exclusion is acceptable. Such categorical exclusions require DOE approval.

Another screening consideration is the possibility that the matter being considered is fully covered by a previous USQD, even when location differences are considered.

6.8 UNREVIEWED SAFETY QUESTION DETERMINATIONS <DOE G 424.1-1, 3.3>

Lines of Inquiry – Does the USQ procedure discuss:

) Details on how to perform a USQ determination including the seven questions?

2) The expected documentation requirements for the USQD? (i.e., evaluation of hazards (nuclear and non nuclear) affecting public, worker, and environment)

3) Reporting requirements?

4) Discussion

Contractors are expected to provide detailed guidance and instructions on how to perform a USQ determination. A USQ determination is that record required by Section 830.203 to document the review of a "change" or a situation where there is reason to believe that the facility's existing safety analysis may be in error or otherwise inadequate. It records the scope of the determination and the logic for determining whether or not a USQ exists.

For the purpose of USQ procedures and performing USQDs, answers to the following seven questions should be thoroughly documented:

1) Could the proposed change increase the probability of occurrence of an accident previously evaluated in the facility's existing safety analyses?

2) Could the proposed change increase the consequences (to workers or the public) of an accident previously evaluated in the facility's existing safety analyses?

3) Could the proposed change increase the probability of occurrence of a malfunction of equipment important to safety previously described in the facility's existing safety analyses?

4) Could the proposed change increase the consequences of a malfunction of equipment important to safety described in the facility's existing safety analyses?

5) Could the proposed change create the possibility of an accident of a different type than any previously evaluated in the facility's existing safety analyses?

6) Could the proposed change create the possibility of a malfunction of equipment important to safety of a different type than any previously evaluated in the facility's existing safety analyses?

7) Does the proposed change reduce the margin of safety?

The USQ procedures should require that a defensible explanation be documented for the answers to each of the USQ criteria. The explanation is to capture the technical basis for each of the answers. It is inappropriate to set a numerical margin for increases in the probability or consequences within which a positive USQD would not be triggered.

If additional protective measures (either administrative or hardware-related) are warranted during an postulated accident situation to ensure adequate protection of the public or to provide worker safety, the USQD should conclude that the USQD is positive, on the basis that either an increase in probability or an increase in consequences of an accident has occurred.

Documentation requirements should be discussed in the implementing procedures. They should identify the level of detail necessary to document performance of the USQD and conclusions reached and include a list of references relied upon to reach this conclusion. This documentation should be complete in the sense that a qualified independent reviewer could draw the same conclusion.

The contractor should follow applicable reporting requirements as outlined in DOE Order 231.1A, *Environment, Safety, and Health Reporting*, August 2003.

The contractor program should recognize that DOE can make a declaration that a USQ exists as part of its oversight responsibility of the USQ process.

6.9 DOCUMENTATION AND RECORD RETENTION <DOE G 424.1-1, 3.4>

1) Lines of Inquiry – Does the USQ Procedure require that:

   1) USQ records be retained for at least the full operational lifetime of the facility and turned over to any new contractor?

   2) An annual summary update of USQDs be submitted to DOE?

B. Discussion:

The contractor shall retain records of USQ actions taken pursuant to 830.203 for at least the full operational lifetime of the facility (i.e., until the facility is turned over to the decommissioning and decontamination (D&D) phase). In the event that there is a change in the contractor operating the facility, the outgoing contractor shall turn over all USQ records to the incoming contractor. At the end of this life cycle phase, the contractor should consider retaining the USQ records for the next phase of the facility life cycle.

All contractors responsible for a nuclear facility are required annually to submit to DOE a summary description of all USQDs performed. The annual report does not include items that were screened out. This report should be submitted on a schedule commensurate with annual update of the Documented Safety Analysis.

6.10 TRAINING AND QUALIFICATIONS <DOE G 424.1-1, 3.5>

A Lines of Inquiry – Does the USQ procedure outline:

Training and qualification requirements for personnel who prepare, review, and approve USQ documents?

2) Requirement for maintaining list of qualified individuals?

3) Discussion:

Requirements for training and qualification includes required educational background, years and/or types of work experience, knowledge of the facility, understanding of DOE requirements related to the facility safety basis (including the USQ process), and familiarity with the facility-specific safety basis.

All personnel responsible for preparing, reviewing, or approving USQ documents should receive training on the application of Section 830.203, including any facility-specific procedures. A list of qualified individuals for each facility should be developed and maintained. The recommended interval for retraining is every two years.

The contractor should maintain a current list of those personnel who are qualified to perform the USQ process.

6.11 SUBMITTAL OF USQ PACKAGE TO DOE <DOE G 424.1-1, APPENDIX B.6>

Lines of Inquiry – NONE

2) Discussion

A formalized procedure that defines the content of the submittal to DOE requesting an amendment to the facility safety basis should supplement the USQ process (regarding positive USQDs.) An adequate package must contain more than just the documentation of the seven questions in the USQD. Such a procedure might outline the expected content as including items such as:

1) an introductory summary of the purpose of the package and its contents,
2) a description of the situation that generated the need for action,
3) alternative actions considered, including JCOs,
4) a description of the selected action,

5) engineering technical considerations,
6) safety implications of the action, including the results of the USQ process when applicable,
7) programmatic implications,
8) revised safety basis documents,
9) schedule considerations, and
10) basis upon which the contractor believes that DOE should approve the action.

6.12 IMPLEMENTATION PLAN, IF NEEDED

1) Lines of Inquiry – NONE

2) Discussion:

An Implementation Plan (IP) should be developed by the contractor if the USQ process does not meet the requirements of the Section 830.203. The use of DOE G 424.1-1 is suggested to assist the contractors in ensuring compliance with the regulations. Deficient program elements should be listed in the IP or comment sections on the checksheet. These items should be discussed with the contractor for incorporation into the USQ process.

7.0 COMMENT/ISSUE RESOLUTION

All comments/issues related to the contractor USQ procedure shall be documented and formally submitted to the responsible line Assistant Manager for transmittal to the contractor through the COR. Any items that have been checked "NO" on the checksheet should be explained or resolved. A sample Comment Resolution form can be found in Appendix B.

8.0 SAFETY EVALUATION REPORT <830.203 (c)>

ORO approval of the contractor USQ Procedure must be issued via a Safety Evaluation Report (SER). The SER contains the basis for the approval. If any items have been checked "NO" on the checksheet and approval of the USQ Procedure is recommened, the rational for approval must be explained in specific detail for each item checked "NO".

If a revision of the contractor's approved USQ procedure is necessary, the associated SER should be revised or supplemented to document the review and basis for approval of the revised procedure.

Appendix A

USQ Procedure Requirements Checksheet

USQ Procedure Requirements Checksheet

Contractor: _____

Procedure No. and Revision: _____

The Reviewer shall verify that the above Procedure addresses each of the following requirements from Section 830.203 or *DOE G 424.1-1 (DOE G 424.1-1 requirements are non-mandatory, however, they provide an acceptable method for implementing the requirements of 10 CFR 830)***:**	**YES**	**NO**
6.1 Roles and Responsibilities defined for Program Implementation <*3.1*>		
6.2 USQ Process Integrated into Facility Change Control Process <*3.1*>		
6.3 Section on Temporary or Permanent Changes in Facility <**830.203(d)(1)**> - requires USQD when change in facility as described in the existing DSA - distinction made between maintenance activities and changes - includes Transportation activities		
6.4 Section on Temporary or Permanent Changes in Procedures <**830.203(d)(2)**> - requires USQD when change in procedure as described in the existing DSA		
6.5 Section on Tests or Experiments <**830.203(d)(3)**> - requires USQD when test or experiment is not described in the existing DSA - defines what Tests may be excluded from USQDs		
6.6 Section on Discovery of Potentially Inadequate Safety Analysis (PISA) <**830.203 (d)(4)**> - requires USQD for discovered PISA - identifies the four required actions - outlines notification, reporting, approval requirements - discusses entry conditions for PISA		
6.7 Section defining USQ Screening Process <*3.2*> - identifies items that can and cannot be screened		
6.8 Section that defines and outlines USQD process <*3.3* > - discusses applicability of process - discusses the seven questions used in a USQD - provides explanation of acceptable documentation for USQD - defines review and approval of USQD - outlines appropriate reporting notifications		
6.9 Section on Documentation requirements and Record retention <*3.4*> - requires annual submittal of USQD summaries to DOE - requires life time retention of USQDs		
6.10 Section defining personnel training and qualification requirements <*3.5*> - requires list of qualified individuals be maintained - specifies minimum requirements for qualification		

6.11 Section on preparation of USQ change package for submittal to DOE <*Appendix B.6*>
- outlines required contents of USQ change package including:
  - revised safety basis documents & JCOs
  - Safety Evaluations and back up information		

The Reviewer shall verify that the above Procedure addresses each of the following requirements from Section 830.203 or *DOE G 424.1-1 (DOE G 424.1-1 requirements are non-mandatory, however, they provide an acceptable method for implementing the requirements of 10 CFR 830):*	**YES**	**NO**
6.12 Implementation Plan prepared, *if not necessary mark "N/A"* - requires analysis for consequences to worker - lists items that should be included in IP: - - -		
COMMENTS:		

Lead Reviewer Signature Date

Appendix B

Comment Resolution Form

USQ Procedure Comment Resolution

Procedure No. and Revision: _____

Reviewer: _____

Comment No.	Comment(s)	Rule Ref.	Resolution