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## **Best Practices in the Unreviewed Safety Question (USQ) Process in Relation Contract Transition**

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**Facility:** EFCOG Nuclear and Facility Safety Group (NFS), Safety Basis Subgroup

**Best Practice Title:** *Best Practices in USQ Process in Relation to Contract Transitions*

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**Brief Description of Best Practice:** Best practices were developed to improve review processes used in nuclear facilities after Contract transitions. This paper offers best practices in how these lessons learned can be implemented in the safety basis community.

**Why the best practice was used:** Focusing on appropriate approaches to expedite the USQ process in relation to Contract transitions can achieve significant successes. As DOE site contracts have changed over the years, the USQ Subgroup has shared these best practices during our teleconferences. This best practice paper is to officially document them. The systems employed and the approaches used, as well as the lessons learned, are best practices suitable for DOE Complex-wide application.

**What are the benefits of the best practice:** The NFS USQ Subgroup believes that the proposed recommendations will help streamline the USQ process in relation to Contract transitions across the DOE Complex, increasing effectiveness and minimizing re-work and/or potential non-compliances that can be both costly and negatively impact program schedule.

**What problems/issues were associated with the best practice:** This paper includes improvements in USQ processes that some contractors may not be aware of. This best practice highlights best practices for consideration. During transition, contractors update procedures with the new company name, organizations, and other administrative information necessary convey information about the new company. Often this update is in the form of a cover page called a “blue-sheet.” Contractors have found the USQ workload associated with Contract transitions to be overwhelming, stretching into the thousands of USQ reviews on blue-sheeted procedures, and subsequently on procedure revisions that incorporate the information in the blue-sheets into a new procedure. Although the revised procedures may be a non-technical change from the original procedure, the procedure number and name are usually changed.

**How the success of the Best Practice was measured:** This best practice paper has helped minimize difficulties encountered when several Contract transitions by different contractors at different sites

**Description of process experience using the Best Practice:** Focusing on key areas in the USQ process in relation to Contract transitions can achieve significant successes. The systems employed and the approaches used, as well as the lessons learned, are documented below. USQ workload associated with Contract transitions can be subdivided into two chronological periods: the initial submittal of blue-sheeted procedures to the USQ process during the Contract transition, and down the road, the submittal of revised procedures to the USQ process that incorporate the blue-sheet changes.

### **Contract Transition**

10 CFR 830.203 requires that new procedures, or changes to existing procedures pertaining to a Hazard Category 1, 2, or 3 Nuclear facility are subject to the USQ process. Blue-sheets are changes to procedures. The DOE USQ Guide discusses implementation details (e.g., specifically which documents are subject to the USQ process). 10 CFR 830.206 requires that a contractor obtain DOE approval for changes to Technical Safety Requirements (TSRs).

During the Contract transition, all procedures are blue-sheeted. For procedures currently subject to the USQ process, their blue-sheets are also subject to the USQ process. The USQ process can be expedited by submitting for DOE approval a list of organization name changes (and other common changes that will arise on blue-sheets). This can then be used to disposition the changes because the USQ Process is not applicable (i.e., DOE has already approved the changes) or to process the changes through application of a Categorical Exclusion (prior DOE approval) or a Screen. This approach will be dependent on each site’s specific

USQ Process Procedure. Some details may be explicitly cited in TSRs, e.g., organization or procedure titles. For those changes, DOE approval of TSR page changes is required.

**Best Practice:** Submit a letter for DOE approval that obtains DOE approval of changes to the TSRs and approval of non-TSR changes (e.g., organization, procedure names or numbers, common blue-sheet topics) to support the USQ process, e.g., application of a Categorical Exclusion (prior DOE approval). A crosswalk of company name and logo changes, organizational name changes, etc. before and after the Contract transition should be included in the letter or as an attachment. An organization chart may also be included as an additional graphical depiction. Approval must be obtained from the DOE Safety Basis Approval Authority. Note: The application of the USQ process on multiple documents with similar changes can be expeditiously documented in a single USQ document.

### **Subsequent Procedure Revisions**

10 CFR 830.203 requires that new procedures, or changes to existing procedures are subject to the USQ process. Revising procedures to incorporate blue-sheets is a change to said procedures. Again, the DOE USQ Guide discusses implementation details (e.g., specifically which documents are subject to the USQ process).

At varying times after the Contract transition is complete, sites commonly revise procedures to incorporate blue-sheets. For procedures currently subject to the USQ process, their revisions are also subject to the USQ process. It is important to monitor procedure revisions to see if that is the only change or if additional changes have been added.

**Best Practice:** Monitor procedure revisions submitted to the USQ process.

- If no other changes are made, and the above best practice was followed, this subsequent application of the USQ process on the revised procedures can be expedited by application of a Categorical Exclusion (editorial revision).
- If additional changes are made, the USQ process needs to consider the entire revision and determine the appropriate path forward (e.g., Categorical Exclusion, Screen, or USQD).
- Revised procedures may also gain new procedure names and/or numbers and may listed as Revision 0. These revised procedures can still be treated as revisions to the previous procedure (even though the name and number may have changed). In other words, if only editorial



changes have been made the procedure can be Categorically Excluded based on the changes, instead of being treated as a new procedure.

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**References:**

DOE USQ Guide (currently DOE G 423.1-1B)