



Department of Energy

Washington, DC 20585

February 4, 2015

JM CHRONOLOGY

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OUT FOR REVIEW 2/9/15
DRB DISCUSSION 2/19/15

MEMORANDUM FOR: INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

THROUGH: KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

FROM: MATTHEW B. MOURY
ACTING ASSOCIATE UNDER SECRETARY FOR
ENVIRONMENT, HEALTH, SAFETY AND SECURITY

SUBJECT: Notice of Intent to Revise Department of Energy Order 426.2
Change 1, *Personnel Selection, Training, Qualification and
Certification Requirements for DOE Nuclear Facilities*

PURPOSE: This memorandum provides justification to revise Department of Energy (DOE) Order (O) 426.2, *Personnel Selection, Training, Qualification and Certification Requirements for DOE Nuclear Facilities*, as part of the quadrennial review and recertification required by DOE O 251.1C, *Departmental Directives Program*.

JUSTIFICATION: The Office of Nuclear Safety consulted field and Headquarters (HQ) offices on whether or not a revision is warranted for DOE O 426.2. As a result, certain aspects of DOE O 426.2 were identified as needing clarification and revision.

Based on this feedback, the revision is intended to clarify educational requirements, certification requirements, and applicability. Addressing these concerns should improve operating training programs, and result in less time focused on managing ambiguous or possibly unnecessary requirements.

There are no valid external, consensus, or other standards available, which can be used in place of this Order. Although the Order invokes or references certain standards, it is the only vehicle available that establishes contractor and Federal requirements to ensure that contractors develop and maintain personnel selection, training, qualification, and certification programs for DOE nuclear facilities and for Federal oversight of contractor programs.

An extended development and review schedule is requested to best engage and gain participation from program, field, and contractor Subject Matter Experts (SMEs) while allowing for the priorities within their respective organizations. Field input is essential for this revision since they requested an update to reflect modernized practices and processes since DOE O 426.2



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was last revised. Part of those changes are based on Lessons Learned and Best Practices the sites have gained from their own experiences and from changes in private industry training practices over the last few years.

IMPACT: The proposed Order revision does not duplicate existing laws, regulations, or national standards nor does it create undue burden on the Department. The impact on HQ, field, and contractor staff is expected to be minimal.

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Ingrid Kolb, Director, Office of Management (MA-1):

Concur:  Nonconcur: _____ Date: 2-19-15

The schedule for completing this revision will aim to meet the proposed directives development schedule shown below:

<u>Standard Schedule for Directives Development</u>	<u>Days</u>
Draft Development	120
Review and Comment (RevCom)	60
Comment Resolution	45
Final Review	30
Total	255

Risk Identification and Assessment

Proposed Revision to Department of Energy (DOE) Order (O)426.2, Personnel Selection, Training, Qualification, and Certification Requirements for DOE Nuclear Facilities

Risk	Probability	Impact	Risk Level
People			
1. If DOE O 426.2 not updated, what is the risk that a failure will impact the well-being of an employee or the public?	Rare	Low to Medium	Minor
Mission			
2. If DOE O 426.2 not updated, what is the risk that accomplishment of the Department's mission will be hindered?	Rare	Negligible to Low	Minor
Assets			
3. If DOE O 426.2 not updated, what is the risk that physical assets will be lost or damaged?	Unlikely	Low to Medium	Minor to Moderate
Financial			
4. If DOE O 426.2 not updated, what is the risk that Department funds will be lost or become unavailable?	Possible	Low	Moderate
Customer and Public Trust			
5. If DOE O 426.2 not updated, what is the risk that the Department will suffer damage to its credibility with the public or other stakeholders?	Unlikely	Low to Medium	Minor to Moderate

Gap Analysis of Existing Risks and Controls

Laws	<ul style="list-style-type: none">• Atomic Energy Act
External Regulation	<ul style="list-style-type: none">• Not Applicable
DOE Regulation	<ul style="list-style-type: none">• <i>10 CFR 830, Nuclear Safety Management</i>
DOE Orders	<ul style="list-style-type: none">• DOE O 426.2 change 1
Contract Controls	<ul style="list-style-type: none">• Existing CRD in DOE O 426.2, change 1
External Assessments	<ul style="list-style-type: none">• Not Applicable/none

Risk Mitigation Techniques

Risk Assessment for DOE O 426.2 Revision					
Risk/Opportunity	Risk Level	Potential Cost/Benefit	External Control(s)	Proposed Mitigation Technique	Internal Control (if needed)
Clarify educational requirements and applicability	Medium	Expected Benefits: (1) Expectations will be clarified; (2) Confidence will be increased that DOE is properly managing contractor training to perform appropriately to ensure adequate protection of the public safety. (3) Public trust will be improved.		MITIGATION existing DOE O 426.2 is adequate, but can be improved Revise DOE O 426.2	DOE O 426.2