



The Secretary of Energy
Washington, D.C. 20585

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DRB DISCUSSION 1/15/2015

MEMORANDUM FOR: INGRID KOLB
DIRECTOR
OFFICE OF MANAGEMENT

THROUGH: KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

FROM: MARK WHITNEY
ACTING ASSISTANT SECRETARY
FOR ENVIRONMENTAL MANAGEMENT

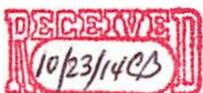
SUBJECT: Notice of Intent to Revise Department of Energy Order 460.1C,
Packaging and Transportation Safety

PURPOSE: The purpose of this memorandum is to provide justification for the proposed revision of Department of Energy (DOE) Order (O) 460.1C, *Packaging and Transportation Safety* as part of the quadrennial review and recertification required by DOE O 251.1C, *Departmental Directives Program*.

JUSTIFICATION: DOE exercises the authority to establish safety requirements for packaging and transportation for DOE, including the National Nuclear Security Administration (NNSA), offsite shipments and onsite transfers of radioactive and other hazardous materials, excluding materials of national security interest covered by DOE O 461.1B, *Packaging and Transportation for Offsite Shipment of Materials of National Security Interest*.

The DOE Environmental Management Office of Packaging and Transportation (EM-OPT) is the Department's Office of Principal Interest (OPI) for DOE O 460.1C, and has responsibility for certifying packages for fissile and Type B materials and associated safety roles and responsibilities for all DOE elements except NNSA. Under the DOE O 460.1C, the NNSA's Office of Packaging and Transportation has responsibility for certifying packages for NNSA owned or controlled fissile and Type B materials and associated safety roles and responsibilities.

DOE Order 460.1C has been in effect longer than 4 years and is in need of updating to clarify requirements, roles and responsibilities.



The realignment of DOE O 460.1C and DOE O 461.1B is now necessary to provide consistent guidance and direction to field sites. The revision of these Orders will also provide the opportunity to better leverage resources of both offices and remove barriers leading to a successful implementation of the DOE/NNSA mission.

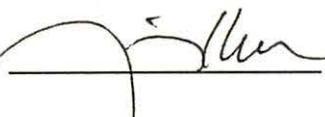
There are no valid external, consensus or other "Standards (e.g., ISO, VPP, etc.)" available which can be used in place of this directive. Although the order invokes and references standards, it is the only mechanism presently in place that specifies DOE requirements and assigns responsibilities for ensuring the safety of packaging and transportation for hazardous materials including radioactive materials and wastes, excluding materials of national security interest.

IMPACT: The proposed directive does not duplicate existing laws, regulations or national standards and it does not create undue burden on the Department. The revision is expected to improve and clarify an existing order. The impact on Headquarters, field and contractor staff is expected to be minimal.

WRITER: Ashok Kapoor, Safety Engineer, Office of Packaging and Transportation (202) 586-8307.

OPI/OPI CONTACT: Christine Gelles, Associate Deputy Assistant Secretary, (301) 903-1669.

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

Concur:  Nonconcur: _____ Date: 1-15-15

The proposed schedule for completing this revision of DOE O 460.1C is to follow the schedule shown below.

<u>Standard Schedule</u>	<u>Days</u>
Draft Development	60 days
Review and Comment (RevCom)	30
Comment Resolution	60
Final Review	30
Total	180

NOTE: WRITER IS REQUESTING AN ADDITIONAL 30 DAYS FOR COMMENT RESOLUTION FOR A TOTAL OF 60 DAYS.

Risk Identification and Assessment

Proposed Revision to DOE 460.1C, Packaging and Transportation Safety

Risk	Probability	Impact	Risk Level
People			
1. If DOE-O 460.1C not updated, what is the risk that a failure will impact the well-being of a worker or the public?	Rare	Low	Minor
Mission			
2. If DOE-O 460.1C not updated, what is the risk that accomplishment of the Department's mission will be hindered?	Rare	Negligible	Minor
Assets			
3. If DOE-O 460.1C not updated, what is the risk that physical assets will be lost or damaged?	Rare	Negligible	Minor
Financial			
4. If DOE-O 460.1C not updated, what is the risk that Department funds will be lost or become unavailable?	Rare	Negligible	Minor
Customer and Public Trust			
5. If DOE-O 460.1C not updated, what is the risk that the Department will suffer damage to its credibility with the public or other stakeholders?	Unlikely	Low	Minor

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">• 10 CFR Part 71 and 49 CFR 171-180
DOE Regulation	<ul style="list-style-type: none">• <i>10 CFR 830, Nuclear Safety Management, (Safe Harbor provisions)</i>
DOE Orders	<ul style="list-style-type: none">• DOE O 426.1C, and O 461.1B
Contract Controls	<ul style="list-style-type: none">• Existing CRD in DOE 460.1C and 461.1B
External Assessments	<ul style="list-style-type: none">• Not Applicable/none

Risk Mitigation Techniques

Risk Assessment for DOE O 460.1C Revision

Risk/Opportunity	Risk Level	Potential Cost/Benefit	External Control(s)	Proposed Mitigation Technique	Internal Control (if needed)
Clarify Order requirements and applicability	Low	<p>Expected Benefits:</p> <p>(1) Expectations will be clarified and confusion with requirements in the O 471.1B will be eliminated;</p> <p>(2) Confidence will be increased that DOE is properly ensuring packaging and transportation safety, leading to adequate protection of the worker, the public and Environment.</p> <p>(3) Public trust will be improved.</p>		<p>MITIGATION</p> <p>existing DOE O 460.1C is adequate, but it needs to be improved to prevent confusion</p> <p>Revise DOE O 460.1C</p>	DOE O 460.1C