

DOE TECHNICAL STANDARDS PROGRAM PROCEDURES

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TECHNICAL STANDARDS COMMENT RESOLUTION

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1. SCOPE

1.1 Purpose

This procedure provides guidance for resolving comments on DOE Technical Standards that are received during the coordination process.

NOTE: Resolution of comments from Review Activities on draft or revised non-Government standards should be handled by the DOE representative to the standards-writing activity in accordance with this procedure.

1.2 Applicability

This procedure applies to all DOE Headquarters and field organizations, management and operating contractors, and laboratories (hereafter referred to collectively as "DOE Components") working to the latest revision of DOE Order 252.1, "Technical Standards Program."

2. COMMENT RESOLUTION

Comments made on DOE Technical Standards should be designated as either "essential" or "suggested." The Preparing Activity must satisfactorily resolve all essential comments with the comment originator (as designated on the comment resolution form). A technical standard with unresolved essential comments will not be published. If an essential comment cannot be resolved through normal channels, the responsible senior line manager (SLM) of the Preparing Activity and the Technical Standards Program Manager will facilitate resolution of the issue. This may include steps such as discussions between the PA and RA; review by immediate PA and RA managers; technical arbitration by subject matter experts (such as DOE Topical Committees); appeals through the TSMC; and escalation to successively higher levels of management. Technical resolution accepted by the comment originator's immediate line manager (or higher) constitutes acceptable resolution of an "essential" (or other) comment.

2.1 Process Description

The comment resolution process begins when comments are received as a result of the document coordination process described in DOE-TSPP-6.

2.1.1 Essential comments. For a comment to be considered essential, it must be such that the comment, if not addressed, would make the document technically unacceptable to the organization. Essential comments need to be clearly justified, and the reviewer must propose a solution on the comment

sheet. The criteria for a Major Comment, as defined under the DOE Directives Program (See DOE O 251.1C), may also be applied.

- 2.1.2 Suggested comments. Suggested comments include editorial changes, questions, and general observations. (Typically, the majority of comments are "suggested". The Review Activity should clearly state on the comment sheet the change to the document that would be necessary to resolve the comment.
- 2.1.3 Resolving essential comments. Final resolution of comments is the responsibility of the Preparing Activity. Essential comments may be resolved in one of the following ways:
- a. The Preparing Activity may accept the comment and incorporate it into the document as written.
 - b. The Preparing Activity may accept the comment with modification. The Preparing Activity notifies the comment submitter (e.g., an individual, or the representative designated as the commentor by an organization) of the modification and gives the submitter up to 30 days to respond. If no reply is received, the Preparing Activity may assume agreement and incorporate the comment as modified.
 - c. If the essential comment does not meet the requirements of paragraph 2.1.1, the Preparing Activity may downgrade the comment from "essential" to "suggested." The Preparing Activity informs the comment submitter in writing of the change and gives the submitter 30 days from the date of the letter to respond. If no reply is received, the Preparing Activity may treat the comment as a suggested comment and revise the document as appropriate. If an essential comment is received without any supporting rationale, it may be downgraded to a suggested comment without observing the 30-day period.
 - d. The Preparing Activity may reject the comment in writing and allow the comment originator 30 days from the date of the letter to respond. If no reply is received, the Preparing Activity may assume concurrence and issue the document without incorporating the comment.
 - e. If the Preparing Activity is unable to resolve the comment, the Technical Standards Program Manager and the appropriate senior line manager will facilitate the resolution.
 - f. If the disposition of an essential comment is appealed (e.g., by the submitter on a technical basis), the appeal may be accepted or rejected as above following further review (e.g., technical review by a Topical Committee, peer arbitration, TSMC arbitration) at a level above the initial commentor and comment reviewer. Once the PA and RA agree on a resolution at the higher level (e.g., the immediate managers), the issue is considered resolved.

2.1.4 Treatment of Suggested Comments. Suggested comments are taken under advisement by the Technical Standards Manager and the Preparing Activity and do not require resolution prior to approval of the document; however, they are to be considered. The Preparing Activity responds (through such means as telecons, meetings, e-mail, or appropriate documentation) to the Review Activity or its Technical Standards Manager concerning disposition of all suggested comments.

2.2 Procedure for Resolving Comments

The following paragraphs describe the typical sequence of events. The comment resolution process is shown in Figure 1.

Person(s) Responsible	Action
<p>a. Preparing Activity</p>	<ol style="list-style-type: none"> 1. Receive review comments and categorize, evaluate, and summarize them. 2. Review supporting information and resolve comments. Respond to commenting individuals, organizations, and other Review Activities. 3. If resolution of the comments requires substantive change to the document, the Preparing Activity, with concurrence of the project's supporting Technical Standards Manager, should redraft the document and resubmit it to all Review Activities for another review. 4. Address unresolved essential comments with the Review Activity's Technical Standards Manager and the commenting individual or organization. 5. If any essential comments still cannot be resolved, work with the senior line manager of the Preparing Activity to reach conclusion.
<p>b. Senior line manager</p>	<ol style="list-style-type: none"> 1. Review all information and attempt to resolve remaining issues. 2. If there are still problems or unresolved essential comments, work with the Technical Standards Program Manager to arbitrate the issue.
<p>c. Manager, Technical Standards Program</p>	<ol style="list-style-type: none"> 1. Review all information concerning remaining issues. 2. As chair of the Technical Standards Managers' Committee, establish an ad hoc appeals panel to resolve the remaining issues.

Comment Resolution

Person(s) Responsible	Action
	<ol style="list-style-type: none"><li data-bbox="678 331 1403 499">3. After the ad hoc panel identifies a solution for the remaining issues, send the solution to the appropriate Technical Standards Managers, Preparing Activity, and the initiating Review Activity.
d. Preparing Activity	<ol style="list-style-type: none"><li data-bbox="678 583 1382 678">1. Incorporate all resolutions into the technical standard and submit the document for approval and issue in accordance with DOE-TSPP-8.<li data-bbox="678 699 1403 793">2. Collect final resolution to all submitted comments and forward to the Technical Standards Manager for inclusion in the project file.

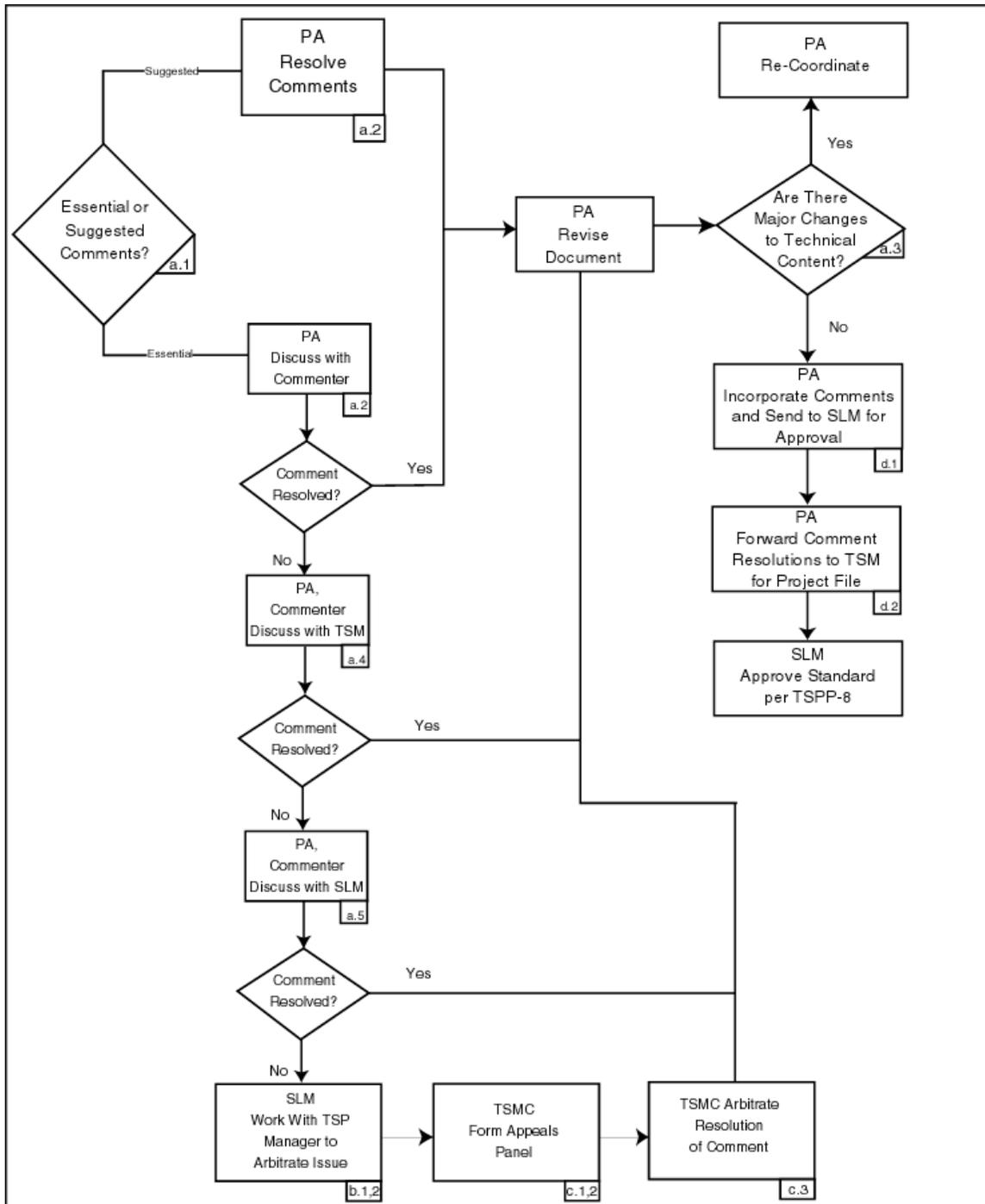


Figure 1. DOE Technical Standard comment resolution process.