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Companywide	Management Control Procedure	For Additional Info: http://EDMS	Effective Date: 10/01/13
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Manual: 1 – Administration

USE TYPE 3

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*The current revision can be verified on EDMS.

1. INTRODUCTION

1.1 Purpose

The document management process is the systematic approach to providing Idaho Cleanup Project (ICP) workers with *controlled documents* (see def.; hereafter referred to as document[s]) that support safe, compliant, efficient completion of ICP work.

1.2 Scope and Applicability

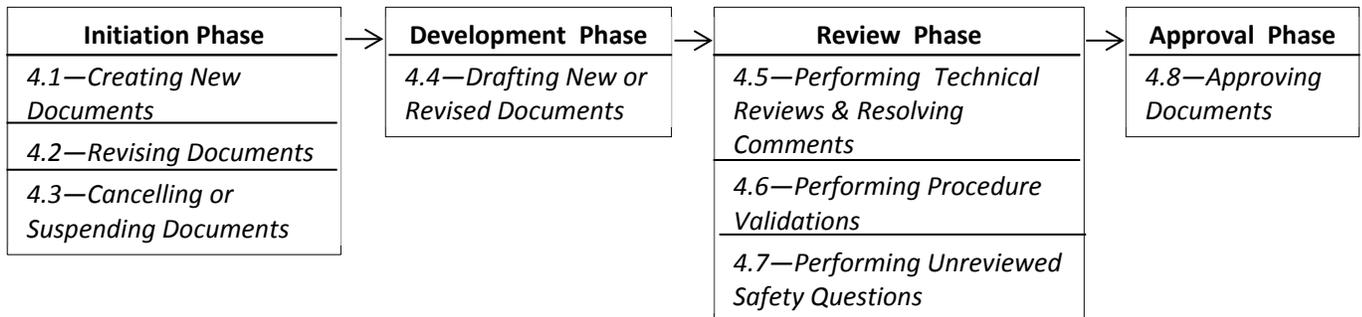
This process applies to all personnel working for or supporting ICP who write, review, approve, or use documents that govern ICP work activities.

The Document Management Program, which is implemented through this process, establishes a hierarchical document structure by which requirements, instructions, guidance, and information are integrated into ICP work.

The document hierarchy, (see Appendix A, ICP Document Hierarchy) includes two categories of documents:

1. Category A document types translate and implement requirements and management direction and provide instructions to perform work.
2. Category B document types provide guidance and information that facilitate understanding of Category A documents.

These hierarchal documents are processed using four distinct phases. When properly applied, (see Appendix B, Document Flow Charts) this process produces documents that are technically correct, usable, and controlled. The four document processing phases include:



Additional document management processes, outside of the four “phase” process, begin with Section 4.9 and include reactivating documents, performing *periodic reviews* (see def.), and initiating *field changes* (see def.) to procedures.

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2. RESPONSIBILITIES

Performer	Responsibilities
ICP Document Management Manager	Develop, coordinate, and direct the Document Management Program. Assess the Document Management Program to ensure continued requirement compliance.
<i>Document Owners</i> (see def., hereafter referred to as owner)	Retain ownership of, approval authority for, and accountability for the technical content, accuracy, and completeness of assigned documents including: <ul style="list-style-type: none"> A. Identify, translate, and implement requirements B. Develop or revise documents within area of responsibility C. Coordinate document reviews, comment resolutions/concurrences, and implementation actions D. Authorize a document field change (DFC) initiation through approval process. NOTE: <i>Assigned owner steps may be delegated (see def.).</i>
Reviewers or Validators	Review and provide comments and comment resolution concurrences on documents that directly affect operation of assigned project, organization, or discipline.
<i>First Line Management</i> (see def.)	Ensure an initiated DFC is processed and completed when needed to allow work to immediately continue. Ensure applicable personnel have been informed of the change before approving work to continue.
<i>Operations Management</i> (see def.)	Concur with a DFC initiation. Designate affected disciplines required to review the DFC. Ensure the field change process has been completed correctly for the documents within area of responsibility.
<i>Document & Records Service Center</i> (DRSC; see def.)	DRSC Personnel - Perform document release and publication activities per MCP-9395, "Releasing and Distributing ICP Controlled Documents." Document Control Supervisors – Perform periodic review interface activities.

3. PREREQUISITES

None

4. INSTRUCTIONS

NOTE: *Because of the one-time use nature of test documents used at the Integrated Waste Treatment Unit (IWTU), the general process described herein for initiating through approving these documents will be used. Field changes to approved IWTU test documents are covered in MCP-2075, "Test Control Procedure for the Integrated Waste Treatment Unit."*

4.1 (Initiation Phase)—Creating New Documents

4.1.1 Owner: To record the need for a new document, determine the correct *document type* (see def.) needed (see Appendix A).

NOTE: *Document identifiers can be obtained from the ICP Electronic Document Management System (EDMS; see Step 4.1.2) or directly from the electronic Document Revision Form (DRF; see Step 4.1.3).*

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- 4.1.2 Owner: Obtain a document identifier by accessing the ICP Electronic Document Management System (EDMS) at http://edms.inel.gov/icp_index.html or the DRF (see Step 4.1.3).
- 4.1.3 Owner: Initiate a document creation using the DRF at http://icp-edms.inel.gov/docs/drif_menu.html by selecting “Create a new DRF.”
- 4.1.3.1 Select “Create” in the DRF “Type of Action” field and fill in the document information fields.
- 4.1.3.2 Obtain a DRF *change number* (see def.).
- 4.1.3.3 Include a detailed description of the new document scope and justification, including referencing requirements implemented by the document creation.
- 4.1.4 Owner: Develop a draft of the new document per Section 4.4.

4.2 (Initiation Phase)—Revising Existing Documents

NOTE: *Any worker may submit suggestions to change existing documents. The ICP Document Suggestion System at <http://edms.inel.gov/pls/dar/suggestDarEntry> is “one” tool available to submit and store suggestions electronically.*

- 4.2.1 Owner: If receiving a suggestion to revise a document, accept or reject the suggestion, documenting your decision via the same tool used to submit the suggestion.
- 4.2.1.1 If rejecting the suggestion, provide the submitter the reason and exit this procedure. No further action required.
- NOTE:** *Most minor revision (see def.) suggestions could be postponed until it is cost effective to revise a document.*
- 4.2.1.2 If accepting the suggestion, but postponing the revision for a later date, file the suggestion and exit this procedure.
- 4.2.1.3 If accepting the suggestion and starting the revision at this time, initiate a DRF per Step 4.2.2.
- 4.2.2 Owner: Initiate a document revision, (including reactivating a document) using the DRF by selecting “Create a new DRF.”
- 4.2.2.1 Select “Revise” in the DRF “Type of Action” field and fill in the document information fields.
- 4.2.2.2 Obtain a DRF change number.

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4.2.2.3 Include a detailed description of the document revision and justification, including referencing requirements implemented by the document revision.

4.2.2.3.1 Alter previously accepted suggestions, as necessary (see Step 4.2.1.2).

4.2.3 Owner: Develop a draft of the document revision per Section 4.4.

4.3 (Initiation Phase)—Canceling or Suspending Existing Documents

4.3.1 Owner: If a document needs to be cancelled or temporarily suspended from use, determine the impacts of the action.

NOTE: *EDMS report, “Active ICP Documents and Impact Analysis” at http://icp-edms.inel.gov/pls/icp_docs/doc_352 is available to determine documents that may be impacted.*

4.3.1.1 If an adverse impact is determined, resolve impacts before continuing the process.

4.3.2 Owner: Initiate a document cancellation or suspension using the DRF by selecting “Create a new DRF.”

4.3.2.1 Select either “Cancel” or “Suspend” in the DRF “Type of Action” field and fill in the document information fields.

4.3.2.2 Obtain a DRF change number.

4.3.2.3 Include a detailed justification for suspending or canceling the document.

4.3.2.3.1 If the document is being superseded, include the “replaced by” document identifier.

4.3.2.4 Delete all previously accepted suggestions (see Step 4.2.1).

4.3.3 Owner: If suspending a document, proceed to Section 4.7; a document review is not required.

4.3.4 Owner: If canceling a document, proceed to Section 4.5 to submit the *DRF package* (see def.) for review.

4.4 (Development Phase)—Drafting New or Revised Documents

4.4.1 Owner: Develop the document draft. (Writing and formatting assistance can be obtained from the Information Management Services organization.)

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- NOTE:** *EDMS report, “Active ICP Documents and Impact Analysis” at http://icp-edms.inel.gov/pls/icp_docs/doc_352 is available listing documents that may be impacted.*
- 4.4.1.1 Determine possible *implementation impacts* (see def.) the document may have on other projects/functions, and consult with the affected parties to resolve adverse impacts which may include:
- A. Significant training activities (for training guidance, contact your project’s training coordinator or the Site Training Review and Implementation Board [STRIB] coordinator at ICPSTRIB@icp.doe.gov)
 - B. Conflicting/overriding direction in other documents
 - C. Project/function-specific documents that will need to be created or revised
 - D. Procurement of additional resources
 - E. Associated forms.
- 4.4.1.2 Obtain the native file of the current version stored in EDMS to use as the baseline for a revision and accept all existing changes before starting a markup.
- 4.4.1.3 Obtain input from applicable SMEs identified in LST-1, “Responsible Managers, Functional Support Managers, and Subject Matter Experts.”
- 4.4.1.4 Obtain input from the applicable vice president(s)/area project manager(s) for documents incorporating new or revised contractual requirements that affect their respective program or project.
- 4.4.1.5 Incorporate applicable Executive Management Directives (EMDs), laws, regulations, and technical and contractual requirements affecting the document.
- 4.4.1.6 Comply with writing standards and instructions for the document type (see Appendix A).
- 4.4.1.7 If the document is being revised, track the changes or state “Entire document revised” in the lower right corner of the first page header.
- NOTE:** *For assistance in creating/revising companywide or facility specific forms, ICPFormsManagement@icp.doe.gov may be contacted.*

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- 4.4.1.8 If the document being created/revised is a form, include in the form's header the identifier of the associated document directing the action.
- 4.4.1.9 If the document being created/revised is a procedure, ensure the following elements are included/updated:
- A. Procedure *use type* (see def.) below the header
 - B. *Procedure basis* (see def.) as the last appendix
- 4.4.1.10 If the document being created/revised is an operations procedure (TPR, EAR, or SPR) ensure the following actions have been completed:
- 4.4.1.10.1 Assign a *writing team* (see def.) as needed.
 - 4.4.1.10.2 Incorporate existing permanent field changes (see Section 4.11) as part of the revision.
 - 4.4.1.10.3 Ensure hazards associated with the procedure have been analyzed and controlled in accordance with MCP-3562, "Hazard Identification Analysis and Control of Operational Activities."
 - 4.4.1.10.4 Include a *procedure review table* (see def.) as part of the procedure basis (see Appendix C, Document Reviews and Periodic Reviews).
- 4.4.1.11 If the document's revision satisfies a periodic review requirement, indicate such on the DRF (see Section 4.9).
- 4.4.1.12 If the document contains controlled unclassified information, see INL procedure LWP-11202, "Controlled Unclassified Information Program" for additional actions.

NOTE 1: *Document pre-reviews (see def.) are strongly recommended during the draft development phase to enable a precise, accurate, and condensed formal DRF technical review completed later in Section 4.5. Pre-reviews are not a substitute for a formal DRF review nor included as part of the formal DRF package.*

NOTE 2: *EDMS tool, "ICP Document Development Review System" at <http://edms/docs/drmain.htm> is available as an automated and interactive tool to perform document pre-reviews.*

- 4.4.2 Owner: Distribute draft document for pre-review(s), as needed, and incorporate applicable comments into the draft document.
- 4.4.3 Owner: Submit the document for formal review using the DRF, see section 4.5.

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4.4.3.1 If the revision is a minor revision proceed to Section 4.7.

4.4.3.2 Proceed to Section 4.5 for all other document reviews.

4.5 (Review Phase)—Performing Technical Reviews and Resolving Comments

NOTE 1: *Reviews are necessary (excluding minor revisions) to ensure the adequacy, correctness, and completeness of the document. Reviews are also costly and should be limited to those reviewers/disciplines whose input is absolutely necessary for ensuring the technical adequacy, accuracy, and completeness of the document. Appendix C provides additional information on performing reviews and resolving comments.*

NOTE 2: *Quality Assurance (QA) and Environmental & Regulatory Services (E&RS) have been designated by the company as Review Response Required (RRR; see def.) disciplines that currently review most DRFs. The owner may also select other RRR disciplines.*

4.5.1 Owner: Select the review audience and the associated RRR determinations.

4.5.1.1 Select individual(s) other than the preparer or the owner.

4.5.1.2 Select technically competent representatives for the subject.

4.5.1.3 Select the QA discipline (unless QA has determined a review exemption).

4.5.1.3.1 Ensure documents implementing requirements of DOE/RW-0333P, “Department of Energy, Civilian Radioactive Waste Management Program’s Quality Assurance Requirements and Description Document have a QA review.

4.5.1.4 Select the E&RS discipline (unless E&RS has determined a review exemption).

4.5.1.5 Select *designated reviewers* (see def.) of disciplines affected by the document’s development/revision; particularly affected disciplines that performed the original review.

4.5.1.6 Select applicable SMEs (see LST-1) whose functions/contract requirements are affected/implemented.

4.5.1.7 Select the Waste Generator Services (WGS) discipline for documents that implement or revises steps related to waste generator processes.

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- 4.5.1.8 Select the NRC licensing engineer for documents affecting an *NRC-regulated facility or program* (see def.), per MCP-2925, “Screen and Evaluate Changes.”
- 4.5.1.9 Submit review requests to the operations safety board, or approved review mechanism for the facility/project, for documents (for example, TPRs, EARs, and EPIs) affecting safety-related equipment and/or emergency procedures.
- 4.5.1.10 Select the facility Fire Protection engineer for documents that implement or revise steps related to fire protection.
- 4.5.1.11 Select the respective nuclear facility manager (NFM; or project authority authorized by NFM) for documents affecting the operation or maintenance of nuclear facilities listed in LST-268, “ICP Nuclear Facility/Nuclear Facility Manager List.”
- NOTE:** *For Worker Safety & Health Program (WS&HP) assistance see <http://icpportal/eshq/ESHQhomepage/SafetyHealth/WSHP/tabid/646/Default.aspx>.*
- 4.5.1.12 Select the facility/project WS&HP representative for documents that are being **cancelled and are listed** in PRD-851, “10 CFR 851 Program Requirements Matrix.”
- 4.5.1.13 Ensure an external release review is obtained, per MCP-2809, “External Release of Information and Technical and Scientific Products,” for documents being distributed beyond the INL.
- 4.5.2 Owner: Enter the reviewer’s names and RRR selections on the DRF.
- 4.5.3 Owner: Determine the “what to review” *review criteria* (see def.) and submit the DRF package for review.
- 4.5.3.1 Attach the drafted document (or a cancellation/suspension note).
- 4.5.3.2 Include pertinent background information and review criteria to assist reviewers in their review, as needed.
- 4.5.3.3 Assign one or more comment resolvers.
- 4.5.3.4 Assign a review due date allowing sufficient time for review, generally 5 to 10 working days.
- NOTE:** *Reviews should be obtained using the DRF’s electronic review system. If this is not feasible, e-mail or hand-written comments may be submitted.*
- 4.5.4 Reviewers: If you are a RRR reviewer and have determined your discipline’s review is exempted for **future** revisions, send an e-mail to the owner and ICPTSBDocumentControl@icp.doe.gov including:

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- A. Document ID, title, and revision number
 - B. A brief statement exempting the document from future review.
- 4.5.5 Reviewers: Review the DRF’s draft document(s) to ensure technical adequacy, completeness, and accuracy.
- 4.5.5.1 Focus the review on topics within your area of expertise.
 - 4.5.5.2 Ensure requirements within your area of expertise are satisfied and are not adversely affected.
 - 4.5.5.3 Limit the review to items listed in the DRF description or identified in the review criteria, unless identifying safety or compliance issues.
- NOTE:** *For comments that are outside the DRF description or review criteria, a suggestion may be submitted to the owner.*
- 4.5.6 Reviewers: Submit comments and recommended solutions to the owner by the specified due date. (If you or your discipline is an RRR reviewer, a comment response of at least “no comment” is required.)
- 4.5.6.1 If additional review time is needed, contact the owner and request an extended review period.
- NOTE:** *Late comments received from non-RRR reviewers may be held for a future revision (unless safety or compliance issues are identified).*
- 4.5.7 Owner: If RRR comment responses are not received by the specified due date, contact the reviewer or discipline’s representative to obtain the documented review.
- 4.5.8 Owner: Resolve comments and consult with reviewers, as needed.
- NOTE:** *Comments received outside of Step 4.5.8.1 criteria do not require resolution unless received from a RRR reviewer. However, it is recommended that a response be provided for all comments.*
- 4.5.8.1 Resolve comments within the DRF description, and those identifying safety or compliance issues.
- 4.5.9 Owner: Assign a resolution acceptance due date and submit resolutions.
- 4.5.10 Reviewers: Review resolutions for acceptance before the assigned due date. (If you are reviewing the resolution for a discipline that has been identified as RRR reviewer, an “accept” or “reject” response, when requested, is required.)
- 4.5.11 Reviewers: If additional resolution review time is needed, contact the owner and request an extended resolution acceptance period.
- 4.5.12 Reviewers: Document your acceptance or rejection via:

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- A. DRF electronic review and resolution acceptance link
- B. Signing the DRF printed form
- C. E-mail concurrence
- D. Meeting minute records containing concurrence discussions
- E. Documented verbal/telephone concurrence.

4.5.13 Owner: If RRR comment resolution responses are not received by the specified due date, contact the reviewer or discipline's representative to obtain the documented review.

NOTE: *If an acceptable resolution cannot be negotiated, the owner or reviewer may escalate the issue up the management line for resolution.*

4.5.14 Owner: If a resolution rejection is received for a comment that meets the criteria in Step 4.5.8.1, resolve concerns with reviewer.

4.5.15 Owner: Incorporate resolutions into the document draft.

NOTE: *If changes from the comment resolution process alter the technical content of the document, or if significant new scope was added, the owner may elect to initiate an additional review beginning at Step 4.5.1.*

4.6 (Review Phase)—Performing Procedure Validations

NOTE: *Procedure validation (see def.) is required for created or revised (excluding minor revisions) TPRs, EARs, and SPRs. Validations may be performed for other document types (such as forms) if requested by the owner. Proceed to Section 4.7 if a validation is not needed.*

4.6.1 Owner: Determine the type of validation to be performed:

- A. Tabletop – qualified user evaluation of the technical content and usability of procedure steps through a “talk-through” process
- B. Simulated walk-down – qualified user simulation of procedure steps
- C. Limited field use (LFU) – qualified user performs actual equipment manipulation using the procedure
- D. Validation in concert with review of field change – qualified user performs validation as part of review of field change.

4.6.2 Owner: If a tabletop or simulated walk-down validation will be performed, initiate Form 412.46, “ICP Controlled Document Validation,” indicating extent and type of validation, then proceed to Step 4.6.4.

4.6.3 Owner: If an LFU validation will be performed, initiate Form 412.46A, “ICP Limited Field Use Validation,” indicating extent of validation.

- 4.6.3.1 Obtain an unreviewed safety question (USQ) review of the procedure draft.

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- 4.6.3.2 Include the validation timeframe and special instructions.
- 4.6.4 Owner: Approve the validation startup and submit the applicable form to validator.
- 4.6.5 Validator: Validate the procedure documenting comments and recommended solutions using the applicable validation form.
- 4.6.6 Validator: Sign validation and list validation team members, if applicable.
- 4.6.7 Validator: Return signed validation form to owner or designee.
- 4.6.8 Owner: If validation comments are received, resolve comments with validator, incorporate resolutions into the procedure draft, and obtain reviewer concurrence with resolutions, as needed.
- 4.6.9 Owner: Include completed validation form and applicable attachments in the document DRF package.
- 4.6.10 Owner: If another validation will be performed on the procedure draft, repeat Steps 4.6.1 through 4.6.9.

NOTE: *If changes from the validation process may alter the technical content of the document, or if significant new scope was added, the owner may elect to initiate an additional review beginning with Step 4.5.1.*

4.7 (Review Phase)—Performing Unreviewed Safety Question (USQ) Reviews

- 4.7.1 Owner: Complete the USQ review need determination per DRF instructions and request a USQ review from a qualified USQ preparer/evaluator as appropriate.
- 4.7.1.1 If changes that alter the technical content of the document are made after completion of the initial USQ review, contact a qualified USQ preparer/evaluator to determine if a revision to the USQ review is required and then document the preparer/evaluator decision on the DRF.

4.8 (Approving Phase)—Approving a Document

- 4.8.1 Owner: Complete the DRF and establish the desired document effective date.
- 4.8.2 Owner: Document your approval for the document's release signifying:
- A. Format follows applicable company writing standards
 - B. Hazard evaluations were completed, if applicable
 - C. Document was correctly reviewed and comments were properly resolved and incorporated

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- D. Procedure validation(s) was completed and documented, if applicable
- E. Procedure review table has been included/updated, if applicable
- F. USQ review was completed
- G. Required implementation actions will be completed **before** the document becomes effective (for example, training activities, and e-mail or iCLIPS communications).

NOTE: *Occasionally, documents may need to be posted on EDMS as “pending” prior to their effective date preparing for future implementation actions. ICP DRSC personnel can assist with “pending” release dates.*

4.8.3 Owner: Submit the following DRF package to ICP DRSC personnel for release and publication:

- A. Document Revision Form (DRF)
- B. Document’s electronic file (for new or revised documents)
- C. Results of hazard evaluations, if applicable
- D. Review comments and resolutions
- E. Validation form results, if applicable
- F. USQ results
- G. Training information, if applicable.

4.8.4 ICP DRSC Personnel: Release and publish the document per MCP-9395, “Releasing and Distributing ICP Controlled Documents.”

NOTE: *The remaining sections include instructions for document activities that may occur outside the four document phases listed in Section 1.2.*

4.9 Performing Periodic Reviews

NOTE: *The need for a periodic review is based on the documented activity and the requirements imposed on that activity. Periodic review frequency is assigned by the owner during the DRF approval phase. The owner receives e-mail notifications as the review date approaches (see Appendix C).*

4.9.1 Owner: When receiving a periodic review notification, review the document and **complete one** of the following actions before the due date:

- 4.9.1.1 If the document is no longer needed for ICP work, complete the DRF process to cancel the document beginning with Section 4.3.
- 4.9.1.2 If changes are needed, complete the DRF process to revise the document beginning with Section 4.2.
- 4.9.1.3 If no changes are needed, e-mail the ICP DRSC that the periodic review has been satisfied and the document is acceptable.

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4.9.1.4 Defer the periodic review and e-mail ICP DRSC personnel with the deferral timeframe and justification for the deferral.

4.9.1.5 Delete the owner-imposed periodic review for documents **not** requiring a periodic review (see Appendix C) and e-mail the ICP DRSC to remove the periodic review assignment.

4.9.2 Document Control Supervisors: For documents that are within 30 days of the periodic review due date without one of the above periodic review actions completed, contact the owner's manager or the respective vice president to receive applicable disposition and processing instructions.

4.10 Reactivating Documents

4.10.1 Owner: If reactivating a document that has been cancelled or suspended, complete the DRF process to revise the document beginning with Section 4.2.

4.11 Making Field Changes to Procedures

NOTE 1: *A field change is initiated for a procedure to allow work to immediately continue. Field changes apply to TPRs, EARs, SPRs, and associated forms. The field change process is not a method to circumvent the DRF process.*

NOTE 2: *A field change can also be initiated against an Emergency Management document affecting facility emergency action levels. See MCP-2413, "Documenting Receipt and Disposition of Communications to Emergency Management Regarding Hazards," for field change instructions.*

4.11.1 Requester: If a field change is needed to allow work to immediately continue, propose the field change to your first line management by initiating Form 412.47, "ICP Document Field Change (DFC)."

NOTE: *In the case of procedure deficiencies identified during an emergency, direction regarding how to proceed is provided by the management in charge during the emergency. Corrections to the procedure are then submitted to management after the emergency is stabilized.*

4.11.1.1 Redline a copy of the procedure, if needed to designate changes specified on the DFC.

4.11.2 First Line Management: Reject the field change proposal and initiate a procedure revision per Section 4.2 to a procedure that meets any of the following criteria:

- A. Contains five (5) existing field changes published against it
- B. Contains an existing permanent field change that is more than six (6) months old
- C. Would not allow the procedure to be usable.

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- 4.11.3 Owner or Operations Management: If accepting the field change proposal, designate disciplines that are required to review the field change using the procedure's review table for assistance.
- 4.11.3.1 If the field change is an expedited field change (also called non-intent change) as described in Appendix C, in addition to a qualified operator, operations management, and nuclear facility manager, if applicable (see Step 4.5.1.11); designate any affected disciplines required to review the change per the DFC instructions.
- 4.11.4 First Line Management: Submit DFC for review.
- 4.11.5 Designated Reviewers: Review the procedure change and document your concurrence.
- 4.11.6 First Line Management: Complete and approve the DFC.
- 4.11.7 First Line Management: Before allowing work to continue, ensure personnel performing the work have been briefed on the field change and/or completed any related required training.
- 4.11.8 First Line Management: File and mark the controlled distribution sets as follows:
- NOTE:** *A list of DFC posting locations can be accessed at http://icpportal/Portals/8/documents/IMS/Hard_Copy_Sets.pdf.*
- 4.11.8.1 Draw a vertical line by the procedure step(s) affected by the DFC.
- 4.11.8.2 Write the DFC number by the drawn vertical line.
- 4.11.8.3 Post a copy of the DFC in front of the affected procedure.
- 4.11.9 First Line Management: Distribute copies of the approved DFC to the owner and to ICP DRSC personnel.
- 4.11.10 ICP DRSC: Post the approved DFC on EDMS and if the field change requires distribution to other affected personnel, transmit a copy of the DFC package and filing instructions to the applicable distribution list.
- 4.11.11 Owner: If an expedited field change was used, within two (2) weeks of the approved DFC, obtain any remaining reviews required by the initial version of the document (or as listed in the procedure review table) and submit the completed package to ICP DRSC personnel.
- 4.11.12 ICP DRSC: Post the completed DFC, which includes the remaining required review signatures, on EDMS and distribute as applicable.

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4.11.13 Owner: If the field change is permanent, incorporate the changes into the document and submit the revised document and completed DFC to ICP DRSC personnel for release and publication.

4.11.13.1 If additional changes are needed outside of the approved DFC, initiate another DRF per Section 4.2.

4.11.14 Owner: If the field change is temporary, coordinate with ICP DRSC personnel to close it when the duration has expired or to adjust the duration in the event the work situation requires it.

5. RECORDS

Document DRF package, which may include:

- A. Controlled document
- B. Document Revision Form (DRF) and associated attachments
- C. Form 412.46, “ICP Controlled Document Validation”
- D. Form 412.46A, “ICP Limited Field Use Validation”
- E. Form 431.62, “ICP USQ Process Proposed Change Form”
- F. Approval for external release.

Periodic review response notifications

Form 412.47, “ICP Document Field Change (DFC)”

NOTE: MCP-557, “Records Management,” the [INL Records Schedule Matrix](#), and associated record types list(s) provide current information on the storage, turnover, and retention requirements for these records.

6. DEFINITIONS

Controlled document. A written document that translates and implements requirements, management directives, and/or instructions to approved methods of communicating the workflow for company work processes and/or assisting documents that support these documents. Such documents require a development through approval process, managed through the Document Management Program and are published and stored on the EDMS.

Change number. (Also referred to as DRF number). A unique number that is used to track each document’s revision history.

Delegate. Individual assigned by the owner to perform owner activities specified in this procedure, excluding approvals.

Designated reviewer. Individual responsible to review and comment on proposed changes to documents that directly affect operation of the project, organization, facility, or discipline the reviewer represents (see Appendix C).

Document and Records Service Center (DRSC). A workgroup charged with controlled document activities such as release, distribution, control, status tracking, storage, and retrieval.

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Document owner. Individual responsible for the approval and accountability of the process, technical content, and accuracy of the document (referred to “**owner**” in this procedure).

Document type. Document descriptors which distinguish the document’s content requirements and its relationship level in the document hierarchy (see Appendix A).

DRF package. Associated records pertaining to all phases of the document process. The DRF package usually consists of records listed in Section 4.8.

Field change. An immediate procedure change for an unanticipated condition or error in order to facilitate continuation of operations that might otherwise stop or be unreasonably delayed. Although review timeframes may differ from one field change to the next (see Appendix C), the procedure does not require retyping before continuation of operation.

First line management. ICP management that may include foreman, supervisors, or those that provide day-to-day work direction.

Implementation impacts. Actions needed to take place before the document becomes effective (training, procurements, creating/revising associated documents/forms, facility modifications).

Minor revision. A document revision within the original intent of the document. Minor revisions are grammatical in nature and are limited to:

- Updating organizational or position titles where there are no changes in responsibilities for the organization
- Correcting editorial/grammatical errors such as typographical errors, spelling corrections, punctuation, and capitalization errors
- Correcting Table of Content or renumbering sections, steps, routing tables, etc. that do not affect the chronological sequence of work
- Updating a document’s format
- Correcting equipment location inconsistencies
- Updating the title or the number of a reference where no technical change is required to the document.

All other revisions, including those that **MUST** be made for work to continue, are not minor revisions.

NRC-regulated facility or program. Documents pertaining to the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI) and the Three Mile Island Unit 2 (TMI-2) ISFSI projects.

Operations management. Encompasses titles such as NFM, Operations Manager, Supervisor, Foreman, and others who have line management responsibilities. Operations management is responsible for hazard identification, analysis, and control of an operational activity and for resolving related issues. See also MCP-2985, “Technical Procedures.”

Periodic review. A review, conducted at defined intervals, when source documents change, or after an abnormal event involving the document occurs. Periodic reviews consider all aspects of a document’s content to ensure continued accuracy.

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Pre-review. A review conducted prior to formal DRF technical review. Pre-reviews ensure the draft document is developed for the end-user, with associated requirements and impacts identified up-front. Comments received do not need resolution nor DRF package inclusion.

Procedure basis. A tool that allows authors, reviewers, trainers, and procedure users to ensure that a procedure meets the letter and spirit of requirements that drive its creation and constraints. See also STD 7, “Procedure Basis Development.”

Procedure review table. A table developed by the owner to identify respective disciplines that are required to review TPRs, EARs, and SPRs.

Review criteria. The “what to review” information that may be provided by the owner to assist the reviewers during the review (applicability, correctness, technical adequacy, completeness, accuracy, and compliance with established requirements).

Review Response Required (RRR). Disciplines identified by the company or by the owner that require a review response (that is, responding to a review request with a “no comment” response or by commenting and responding to the comment resolutions).

Use type. Categorization of procedures based on the risks associated with the performance or impact to the facility of the procedure. Use type categories are defined in MCP-2985, “Technical Procedures” and are included in the document header. Use types include:

Document Type	Use Type	Comments
EAR, SPR, TPR	1 or 2	The assignment of use type 1 versus use type 2 should be based on task complexity, task hazards, performance frequency, and consequences of incorrect performance. The owner may assign the more rigorous use type 1 even if the procedure fits the criteria of use type 2.
MCP	3	
All Other	N/A	

Validation. A process that focuses on confirmation of usability. Validation confirms that the procedure instructions can be performed by the intended users as written.

Writing team. A body or quorum consisting of a procedure writer, operations expertise, safety professional, system engineer, and other expertise as determined. Through collaborative efforts amongst the team and with other SMEs, the writing team develops a procedure based on task complexity, end-user experience and training, performance frequency, and consequences-of-error significance.

7. REFERENCES

ANSI/ASME NQA-1-2008 with Addenda through NQA-1a-2009, “Quality Assurance Requirements for Nuclear Facility Applications”

DOE/RW-0333P, “Department of Energy, Civilian Radioactive Waste Management Program’s Quality Assurance Requirements and Description Document”

DOE-STD-1029-92, “Writer’s Guide for Technical Procedures”

LST-1, “Responsible Managers, Functional Support Managers, and Subject Matter Experts”

LST-268, “ICP Nuclear Facility/Nuclear Facility Manager List”

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LWP-11202, “Controlled Unclassified Information Program” (INL procedure)
MCP-123, “Unreviewed Safety Question”
MCP-2447, “Requirements Management”
MCP-2809, “External Release of Information and Technical and Scientific Products”
MCP-2925, “Screen and Evaluate Changes”
MCP 2985, “Technical Procedures”
MCP-3562, “Hazard Identification, Analysis, and Control of Operational Activities”
MCP-9395, “Releasing and Distributing Controlled Documents”
PDD-1012, “Environmental Management System”
PRD-115, “Configuration Management”
PRD-851, “10 CFR 851 Program Requirements Matrix”
PRD-5076, “Instructions, Procedures, and Drawings”
PRD-5077, “Document Control”
SAR-100, “ICP Standardized Safety Analysis Report (SAR)”
TSR-100, “ICP Standardized Technical Safety Requirements (TSR) Document”

8. APPENDIXES

Appendix A, ICP Document Management Hierarchy
Appendix B, Document Flow Charts
Appendix C, Document Reviews and Periodic Reviews
Appendix D, Procedure Basis

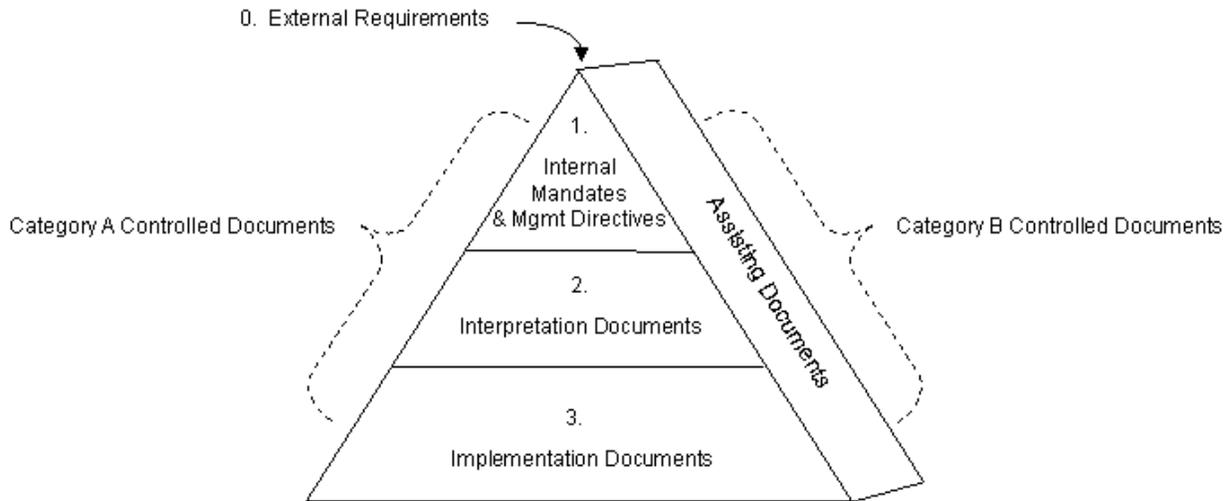
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Appendix A

Exhibit 1 – ICP Document Management Hierarchy

Exhibit 1 displays the ICP Document Management Hierarchy, its hierarchy levels and definitions, and demonstrates the relationship between Category A documents and Category B documents referred to in Section 1.2 of this procedure.

Exhibit 1



Hierarchy Level	Hierarchy Definitions
0	<i>External Requirements.</i> External requirements are mandatory criteria, actions, or processes that are applicable to ICP work activities. External requirements become contractually binding through the ICP contract. (See MCP-2447, “Requirements Management,” for further information.)
1	<i>Internal Mandates and Management Directives.</i> (Category A) - Documents that state broad philosophical and fundamental company expectations for conducting business. They reflect internal requirements necessary to carry out programs and work within the company.
2	<i>Interpretation Documents.</i> (Category A) - Documents that translate and communicate requirements and management directives to establish business and operating parameters. Interpretation documents are tools to communicate expectations in a controlled manner. They describe the responsibilities associated with a particular function.
3	<i>Implementation Documents.</i> (Category A) - Documents that are the primary means by which workers perform work safely and effectively. By prescribing the methods for performing specific tasks, implementation documents specify work directions, actions, and conditions necessary to operate in accordance with requirements. These documents are the tools that document how requirements are implemented and how productivity, safety, and quality of operations are ensured.
NA	<i>Assisting Documents.</i> (Category B) - Documents providing non-mandatory guidance and information that facilitate understanding and completion of work being performed for the ICP. These documents do not contain requirement statements or instructions to perform work.

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Exhibit 2 - Category A Documents

Exhibit 2 contains a list of Category A document types and definitions, their hierarchy level and applicable writing standards/instructions.

NOTE: Exemptions to formatting and DRF requirements will be considered on a case by case basis by contacting the manager of Information Management Services Document Management. If the document implements requirements, it should be considered a Category A document.

Hierarchy Level & Title	Doc. Type	Definition	Writing Standards and Instructions (Non-inclusive list/abbreviated titles)
1. Internal Mandates & Mgmt Directives	CER	<i>Company environmental requirement.</i> Management-determined environmental requirement, which is not based upon external laws and regulations, but reflects company rules on how a specific environmental issue will be implemented within the company.	MCP-3675, “Environmental Requirements Management” See E&RS organization for document numbering assignment.
	EMD	<i>Executive management directive.</i> An executive management-level directive that reflects internal company requirements expected to be followed by company personnel and subcontractors.	Form 412.45, “Executive Management Operational Directive”
	POL	<i>Policy.</i> Identifies core management values.	Form 412.09, “ICP Controlled Doc. Header”
2. Interpretation Documents	ESS	<i>Evaluation of the safety of the situation.</i> A documented assessment of the safety of the situation resulting from the declaration of a potential inadequacy in the safety analysis.	MCP-123, “Unreviewed Safety Questions”
	HAD	<i>Hazard assessment document.</i> Identifies the types and quantities of hazards present in a given facility and describes potential effects from those hazards if an accident occurs. May also prescribe responses to mitigate the effects from identified accident scenarios.	MCP-1176, “Safety Analysis Process”; MCP-583, “Performing Fire Hazards Analysis...”; MCP-2451, “Safety Analysis for... LTHC3 Facilities”
	IAG	<i>Interface agreement.</i> Authorizes agreements which describes functional relationships and assigns responsibilities between company facilities, organizations, projects, and programs.	TEM-8, “Template for Tenant Use Agreements”
	ISD	<i>Interim status document.</i> Identifies Part A operating criteria and limits for a facility or process to achieve compliance with RCRA interim status regulations. ISDs are canceled when the RCRA Permit Part B has been revised and released for use.	MCP-408, “Procedure for Preparing RCRA Part B Permit Applications”
	JCO	<i>Justification for Continued Operations.</i> A temporary safety basis document that allows operation of a facility when the current technical or operational requirements of the safety basis cannot be fully met.	MCP-1459, “Preparation of Justification for Continued Operation or Safety Basis Supplement”
	PER	<i>Permit.</i> Imposes conditions by the appropriate regulatory agency as adequate application of environmental regulations for a specified facility or process.	MCP-408, “Procedure for Preparing RCRA Part B Permit Applications”
	PRD	<i>Program requirements document.</i> Identifies and interprets requirements of a particular program, integrates requirements by topic, and provides traceability to requirement sources.	STD-2, “Program Requirements Documents”
	QAP	<i>Quality Assurance Plan.</i> Documents overall quality assurance requirements and defines quality assurance policies. Examples include: Quality Assurance Project Plans, and Quality Program Plans	MCP-561, “Quality Program Plan/Quality Assurance Project Plan Development”

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Exhibit 2 - Category A Documents (Continued)

Hierarchy Level & Title	Doc. Type	Definition	Writing Standards and Instructions (Non-inclusive list/abbreviated titles)
	SAR	<i>Safety analysis report.</i> Documents the adequacy of safety analysis for a nuclear facility or non-facility nuclear operation.	MCP-1176, "Safety Analysis Process"
	TFR	<i>Technical and functional requirement.</i> Identifies the technical requirements that ensure compliance with specific regulations, the functional requirements, and the performance requirements; and establishes the design criteria in sufficient detail to proceed with the design.	MCP-9185, "Technical and Functional Requirements"
	TSR	<i>Technical safety requirement.</i> Specifies an administrative control to prevent or mitigate the consequences of a potential accident identified in a nuclear facility SAR.	MCP-1176, "Safety Analysis Process"
3. Implementation Documents (Procedures)	EAR	<i>Emergency, abnormal operating, and alarm response procedure.</i> Directs specific emergency, abnormal operating, and alarm response actions through step-by-step instructions. Used to attain a stable state to allow for follow-up actions to occur.	STD-10, "Emergency, Abnormal Operating, and Alarm Response Procedure Writing"; STD-7, "Procedure Basis Development"
	EPI	<i>Emergency plan implementing procedure.</i> Directs specific implementing actions to execute emergency plans.	Form 412.09, "ICP Controlled Doc. Header"
	FRM	<i>Companywide or Facility/Project forms.</i> Provides blank fields for standardized data collection and/or indicating completion of work.	Contact ICP Forms Management for companywide form number assignments ICPFormsManagement@icp.doe.gov Facility/Project form number assignments can be obtained from EDMS.
	MCP	<i>Management control procedure.</i> Directs the administrative activities necessary to implement requirements and to carry out a technical program, management control program, or design control program.	STD-8, "Management Control Procedure Writing"; STD-7, "Procedure Basis Development"; TEM-5, "General-Use Procedure Template"
	SPR	<i>Sampling procedure.</i> Process to obtain/analyze samples.	TEM-104, "Model for Preparation of Sampling Procedures"
	TPR	<i>Technical procedure.</i> Directs technical processes through detailed step-by-step instructions. TPRs incorporate appropriate information from documentation such as facility design documents, facility safety analysis, field sampling documents and technical safety requirements.	STD-9, "Technical Procedure Writing"; STD-7, "Procedure Basis Development"; TEM-5, "General-Use Procedure Template"

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Exhibit 3 - Category B Documents

Exhibit 3 contains a list of Category B document types, their definitions and applicable writing standards/instructions.

To effectively manage these documents in EDMS, minimum formatting and processing requirements must be followed in addition to those contained within their applicable writing standards (unless otherwise exempted in the table below).

Minimum Formatting Requirements: All Category B documents must include a:

1. Document identifier obtained from EDMS (see Step 4.1.2)
2. Current revision number
3. Effective date
4. Associated DRF change number.

Although not mandated for Category B documents, the use of Form 412.09, “ICP Controlled Document Header,” provides an easy to use template with fields already indexed to include all of the above required formatting information.

Although Category B documents may have flexible development processes, and most do not require validation or periodic reviews, a review to create, revise, cancel or suspend must still be obtained (excluding minor revisions) and the review must comply with applicable review instructions in Section 4.5. If the document implements requirements, it should be considered a Category A document.

DRF Requirements: Unless otherwise exempted in Exhibit 3 table, a DRF is completed for all Category B documents. However, the following blocks on the DRF may be answered as “no and/or NA”:

1. Block 5 – Validation Reviews: Category B documents do not require procedure validations.
2. Block 7 – Periodic Review Requirements: Most Category B documents do not require a periodic review assignment unless directed by the owner or other regulatory requirements. See Appendix C Periodic Reviews for additional information.

| Exemptions to formatting and DRF requirements will be considered on a case by case basis by contacting the manager of Information Management Services Document Management. If the document implements requirements, it should be considered a Category A document.

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Exhibit 3- Category B Documents

Doc. Type	Titles and Definitions	Writing Standards and Instructions (Non-inclusive list/abbreviated titles)
CTR	<i>Charter</i> . Explains the functions, operating principles, and responsibilities of a committee or working group.	Form 412.09, "ICP Controlled Doc. Header"
DDS	<i>Design Data sheet</i> . Summarizes the performance and other technical characteristics of a component.	MCP-2377, "Development, Assessment, and Maintenance of Drawings" DRF Exemption ^a
DWG	<i>Drawing</i> . Graphically represents configuration of systems, structures, facilities, or components, and is maintained as a part of the ICP drawing set.	MCP-2377, "Develop., Assessment, & Maintenance of Dwgs" STD-11, "Dwg Requirements Standard"
EDF	<i>Engineering design file</i> . Documents the basis for an engineering design. May include design analysis, notes, technical studies, investigations.	MCP-2374, "Formal Analyses & Calc's"; MCP-2059, "Commercial Analyses & Calc's"; Form 431.02, "Engineering Design File" DRF Exemption ^a
EHA	<i>Emergency hazards assessment</i> . Documents hazards identified in an Emergency Hazards Survey significant enough for a quantitative analysis.	Form 412.09, "ICP Controlled Doc. Header"
EHS	<i>Emergency hazards survey</i> . Documents the qualitative examination of hazards that is used to identify conditions.	Form 412.09, "ICP Controlled Doc. Header"
ETI	<i>Environmental technical interpretation</i> . Documents company determinations of the intent of a regulation/requirement and it's future implementation.	MCP-3675, "Environmental Requirements Management" See E&RS org. for document numbering assignment.
FLH	<i>Flash hazard analysis</i> . A study investigating a worker's potential exposure to arc-flash energy, injury prevention, safe work practices, and appropriate PPE.	Form 420.16, "Flash Hazard Analysis Worksheet" DRF Exemption ^a
GDE	<i>Guide</i> . Suggests work methods or provides other information that users apply at their discretion.	Form 412.09, "ICP Controlled Doc. Header" May be in Video Format
JSA	<i>Job safety analysis</i> . Identifies the hazards associated with a particular job and describes means to mitigate the hazards.	MCP-3450, "Developing and Using Job Safety Analyses"
LST	<i>List</i> . Provides a catalog or roster of items that share common characteristics. (Lists tied to Safety Basis documentation may be a Category A document.)	Form 412.09, "ICP Controlled Doc. Header"
LTS	<i>Liquid transfer sheet</i> . Provides valve lineups, system checks, and instructions to perform a transfer of solution from one vessel to another.	TPR-6945, "Liquid Transfer Sheets"
PDD	<i>Program description document</i> . Describes the management basis and broad boundaries for how a program or facility operates.	Form 412.09, "ICP Controlled Doc. Header"
PLN	<i>Plan</i> . Provides a method or approach, formulated prior to initiation, for documenting work scope, goals, work criteria/boundaries, detailed data, etc. Plans do not direct work activities.	GDE-70, "Construction Project Management Methods"; STD-13, "Configuration Mgmt Plans"
RPT	<i>Report</i> . Collects and records the results of engineering, technical or administrative activities.	STD-7028, "Technical Writing & Editing," unless directed otherwise by external requirements
SDD	<i>System design description</i> . Describes specifications of specific structure/facility, system, or component; system design features, installed physical configuration, and associated documentation.	MCP-3572, "System Design Descriptions" (SDDs associated with Safety Basis documentation are considered Category A type documents.)
SOW	<i>Statement of work</i> . Details the work requirements associated with a services-type contract.	MCP-9359, "Specifications and Statements of Work"; TEM-101 "Template for SOWs" DRF Exemption ^a
SPC	<i>Specification</i> . Specifies detailed, precise acceptance criteria for items, materials, products, or services.	MCP-9359, "Specifications and Statements of Work"; TEM-111 "Specification Template" DRF Exemption ^a
STD	<i>Standard</i> . Specifies criteria to be met to achieve the level of quality that is appropriate for the specific purpose.	Form 412.09, "ICP Controlled Doc. Header"

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Exhibit 3- Category B Documents (Continued)

Doc. Type	Titles and Definitions	Writing Standards and Instructions (Non-inclusive list/abbreviated titles)
TEM	<i>Template.</i> Provides a boilerplate used to create a specific document type.	Form 412.09, “ICP Controlled Doc. Header”
TBL	<i>Technical baseline.</i> Documents SSC design, operation and maintenance requirements and depicts SSC physical configuration. Documents regulatory compliance, facility characterization, and technical change within the Radiological Control Program.	MCP-1492, “Technical Baseline”; MCP-6, “Radiological Control Program Technical Basis and Conduct of Technical Change” DRF Exemption^a
TRN	<i>Training.</i> Documents company instructional material.	MCP-48, “Instructional Material Development, Revision, and Release” DRF Exempt^b
a.	DRF Exclusion – These documents have received an optional exemption from completion of all portions of the DRF except for signature validation and release (transmittal) to Document Control under the DRF minor change designation. A completed DRF is required for document suspensions and cancellations depending on the specific document type.	
b.	DRF Exempt – These documents have received an optional exemption from requiring a DRF.	

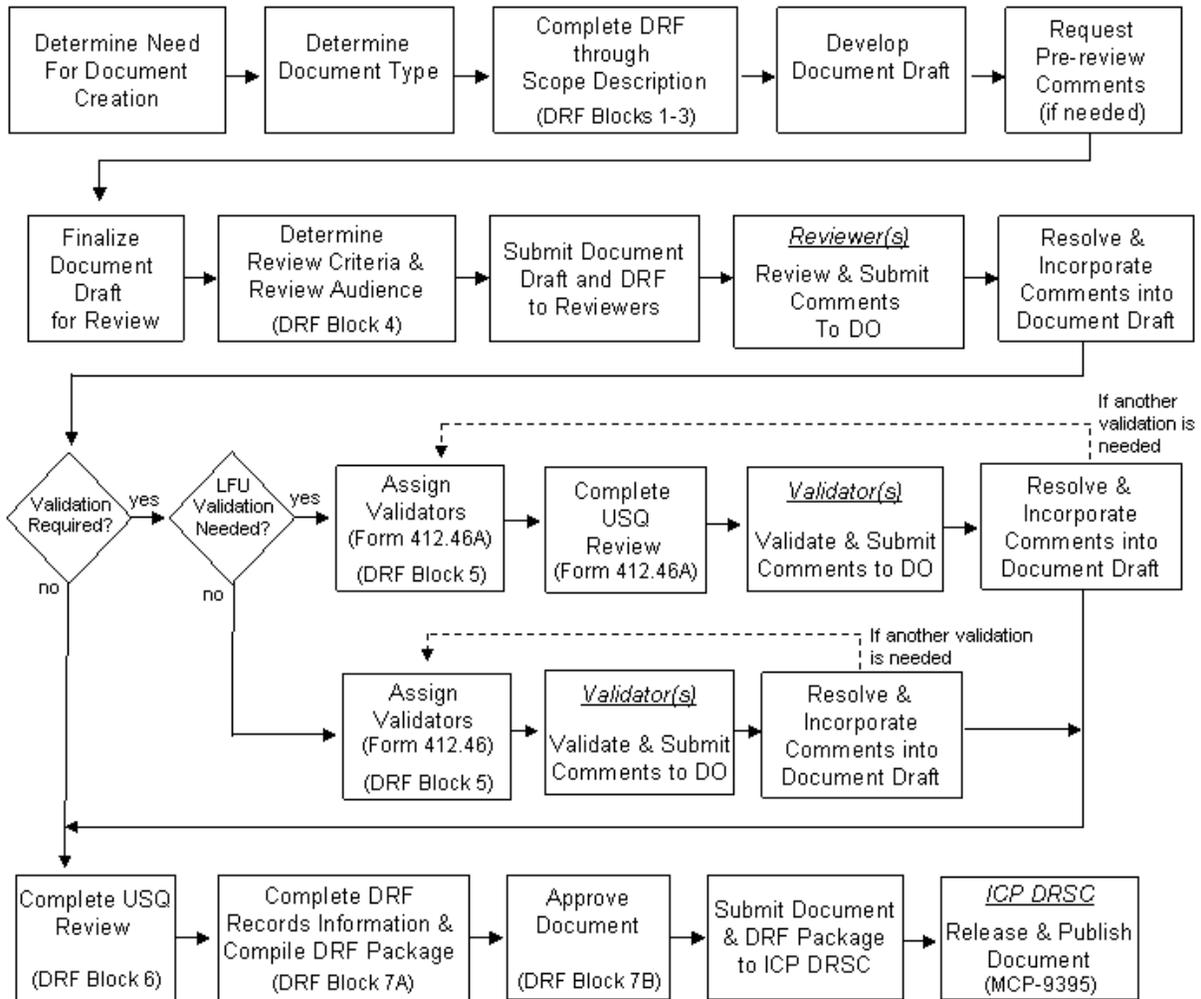
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Appendix B

Document Flow Charts

Creating Documents

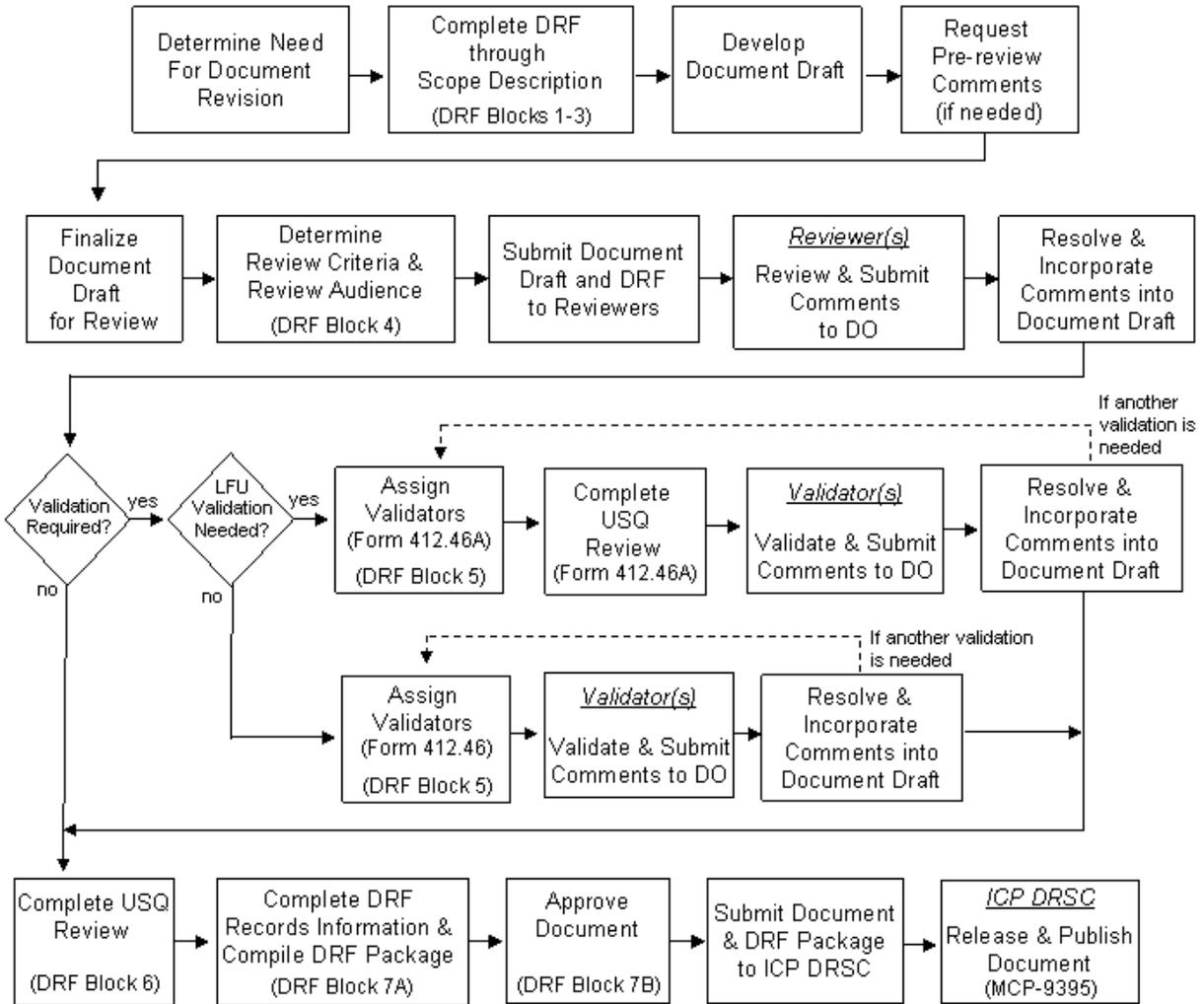
Unless otherwise *identified*, all steps are the responsibility of the Doc. Owner (DO)



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Revising Documents

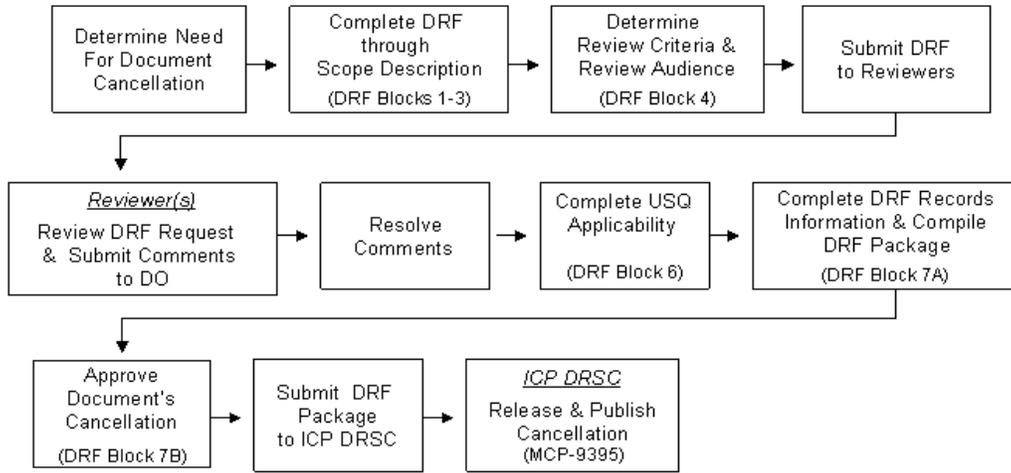
Unless otherwise *identified*, all steps are the responsibility of the Doc. Owner (DO).



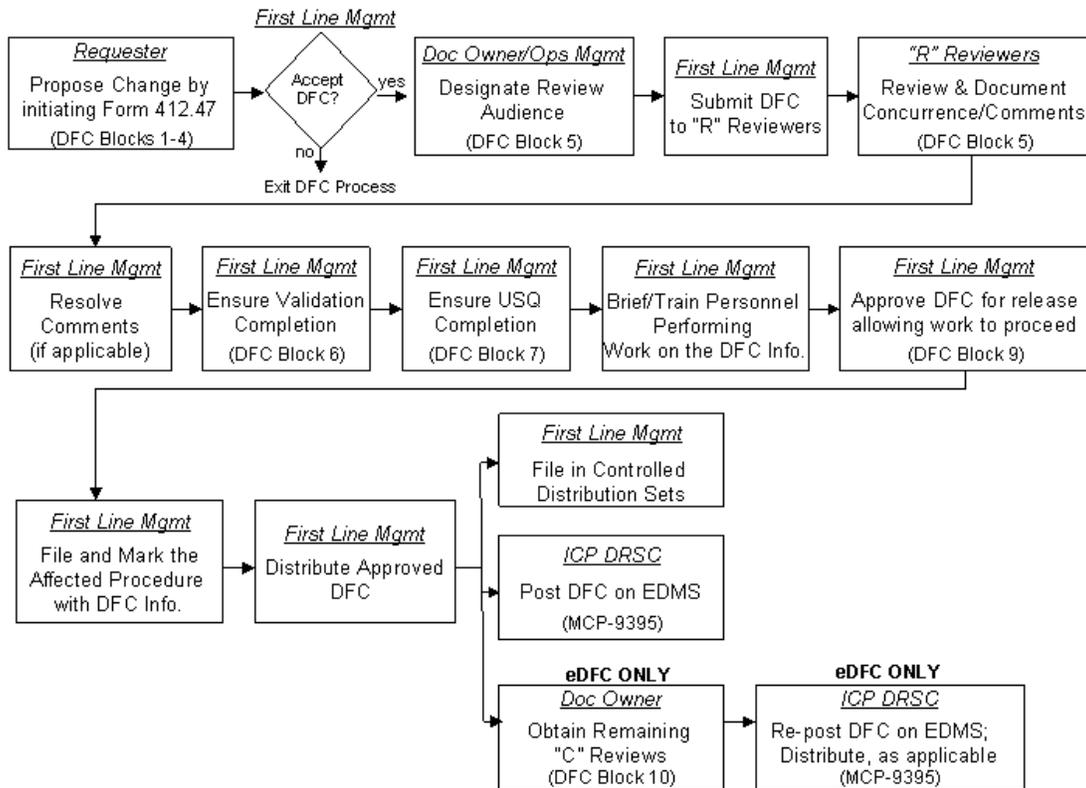
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Cancelling Documents

Unless otherwise *identified*, all steps are the responsibility of the Doc. Owner (DO).



Making a Document Field Change (DFC)



R = Review required to allow work to immediately continue using the DFC
 C = Review concurrence required within two (2) weeks of approved DFC

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Appendix C

Document Reviews and Periodic Reviews

Document Development Pre-reviews (Section 4.4): Document pre-reviews are “undocumented” reviews performed by peers and other users during the document’s development phase. Pre-reviews help ensure the draft is created or revised for the end-user, and help identify impacts and requirements up-front in the draft document development process. For example, MCP-3573, “Vendor Data Process” provides instructions to engineers on identifying and dispositioning procured vendor data. The owner of MCP-3573 may elect to send pre-review copies to “several” engineers who use the document to obtain their feasibility/usability input, although these same engineers may not necessarily be subject to the formal DRF technical review referenced in Section 4.5.

Pre-review comments are used at the owner’s discretion and are not required to be incorporated into the document, resolved, or included as part of the formal DRF package. The EDMS tool “Document Development Review System” (<http://edms/docs/drmain.htm>) is one tool available to accomplish a pre-review.

Document Technical Reviews (Section 4.5): Reviews are evaluations performed on documents to verify technical accuracy, safety considerations, implementation considerations, conformance to requirements, and completeness and appropriateness of document content. Thus, determining the review audience and review criteria is a crucial component of the review.

Review Audience – The reviewers designated to review a specific document (review audience) depends on the specific disciplines and/or projects that are directly affected by the document’s creation, revision, or cancellation. These include:

1. Stakeholders that own requirements either identified or implemented in the document.
 - If the document is a procedure, search the document’s procedure basis and listed requirement sources to identify the disciplines of affected stakeholders.
 - If the document includes a “Reference” section, select owners from the list of referenced documents as potential reviewers whose documents may be impacted by your document’s revision.
2. Individuals with key roles in coordinating or implementing the document.
 - If the document includes a Responsibilities section, include selected reviewers that have major responsibilities listed in the document.
 - Access the EDMS report “Active ICP Documents and Impact Analysis” at http://icp-edms.inel.gov/pls/icp_docs/doc_352 to obtain a list of all other documents that currently reference the document you are submitting for review. Select owners from the list as potential reviewers whose documents may be impacted by your document’s revision.

The user of a document, which may or may not be listed as a “performer” in the document’s content, is not automatically considered a reviewer of the document. For example, a Human Resources document, such as GDE-10, “Employee Handbook,” impacts and is used by all

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CWI employees; however, this does not give all users of the document authority to review and comment on the document’s revision. However, in another example, MCP-135, “Document Management,” directly implements requirements from Quality Assurance, Nuclear Safety, Conduct of Operations, and Environmental. These stakeholders would need to ensure their requirements are being implemented. Also, supervisors of document control, document writers, and records management provide a key role in coordinating and implementing MCP-135 processes within their areas of responsibility. These stakeholders and key workers should be considered as possible reviewers when a revision occurs to MCP-135.

LST-1, “Responsible Managers, Functional Support Managers, and Subject Matter Experts,” lists company subject matter experts with technical expertise in the disciplines within their responsibility. This list is available to assist owners when selecting appropriate reviewers.

Many projects within ICP also maintain a list of project specific subject matter experts to assist in reviews pertaining to implementing or modifying operational or project specific requirements.

New (or upon revision) operations procedures (TPR, EAR, or SPR) need to include a procedure review table listing review audience requirements specific to that procedure. The table should be included at the beginning of the procedure basis.

An example of a procedure review table is shown below. The required reviews (marked with an “X”) are examples of the reviews required for a specific procedure in accordance with its initial version, graded approach requirements, and any disciplines that have determined that they are “opted out” (per Step 4.5.4) from further reviews for the procedure.

Procedure Review Table Example							
Review Discipline	Rev.	DFC Intent ^b Change	DFC Nonintent ^c Change	Review Discipline	Rev.	DFC Intent ^b Change	DFC Nonintent ^c Change
Operations Management	X ^a	X	X	Industrial Safety			
Qualified Operator	X	X	X	Engineering			
Radiological Engineering				Industrial Hygiene			
Environmental	X		*	Other:			
Quality	X	X	*				

a. X = review required.
 b. Reviews for intent DFCs require the same discipline reviews required for a revision.
 c. Reviews for nonintent DFCs can be performed with only Operations management and a qualified operator’s review and then implemented for immediate use. However, the remaining discipline reviews, as indicated by an asterisk (*), must be obtained within 2 weeks. See MCP-2985, “Technical Procedures,” for definitions of intent and nonintent changes.

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Review Criteria – Review criteria is the “what to review” and “how to review” information that may be provided by the owner to assist the reviewers during the review. Review criteria can be included directly on the DRF (usually in the description section) or as an attachment to the DRF package. This may include:

1. Pertinent background information and/or history regarding the need for the document’s development or revision
2. Justification and explanation for limiting the review to specific portions of the document
3. Justification and explanation for determining a limited review audience.

Performing Reviews – Review timeframes are to be determined by the owner, considering the complexity of the review and reviewer(s) workload assignments. Reviewers should submit comments within the review timeframe. If you are reviewing for a discipline that has been identified as RRR, a comment response of at least “no comment” is required.

If additional review time is needed, the reviewer should contact the owner and/or resolver to request an extended review period. The owner/resolver may elect to extend the review period by changing the due date on the DRF or by other mechanisms (such as submitting comments via e-mail or meeting minutes).

If reviewers have comments that are outside the DRF description or review criteria, a suggestion may be submitted to the owner. The EDMS Document Suggestion System (<http://edms.inel.gov/pls/dar/suggestDarEntry>) is one tool available to generate, submit, and store suggestions electronically.

Review Comment Resolutions – Comment resolutions may be performed by an individual or individuals as determined by the owner.

If the reviewer’s discipline has been identified as an RRR and a comment response has not been submitted, the resolver must contact the respective reviewer(s) or a representative for the reviewer’s discipline, to obtain the documented review.

All comments that fall within the DRF description or address safety or noncompliance concerns, must be resolved (excluding “no comment” responses). And as a courtesy to the reviewers, all other comments should be addressed (even if the resolution is to consider the comment during a future revision).

When resolving comments, each comment should be evaluated and when necessary, discussed with the reviewer or an authorized alternate, to reach an acceptable resolution. If an acceptable resolution cannot be negotiated, the owner or reviewer may escalate the issue(s) up the management line for resolution.

Comment Resolutions Concurrence – Reviewers are given a designated review period to accept or reject the resolutions submitted for their comments. If additional resolution review time is needed, the reviewer should contact the owner and/or resolver to request an extended date. The

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owner/resolver may elect to extend the resolution review period by editing the DRF's due date that was assigned to the specific comment resolution.

If the resolution is for a comment that was submitted by an RRR reviewer, an accept or reject response is required via one of the following mechanisms:

1. DRF electronic resolution acceptance or rejection link
2. Signing the DRF paper form
3. E-mail concurrence
4. Meeting minute records documenting obtained concurrence
5. Documented verbal/telephone concurrence.

If the RRR reviewer does not respond to the resolution request, the resolver must contact the reviewer, or a representative for the reviewer's discipline, to obtain a documented resolution concurrence.

If an acceptable resolution cannot be negotiated, the owner or reviewer may escalate the issue up the management line for resolution.

Periodic Reviews (Section 4.9): Issued operations procedures are reviewed periodically, as defined in the table below, or when source document's change, or after an abnormal event involving the document. If developing a new document, the need for, and interval of, periodic reviews should be determined using the following criteria:

Document Type	Periodic Review Interval	Review Deferral Time Frames
SAR, TSR	Mandatory—annually.	Per nuclear safety requirements.
JSA	Mandatory—1 year maximum review for highly hazardous activities. 5 year maximum review for all other activities.	1 year—No deferrals allowed. 5 year—Up to 12 months.
EAR, PRD, SPR, TPR	Mandatory—5 year maximum	Up to 12 months.
MCPs or other documents with no specific periodic review requirement	No mandatory periodic review. The owner determines if periodic review assignment is needed and the appropriate interval.	Up to 2 years.
Document with regulatory review requirement	As stated in the regulation.	Per regulation agreement.

As the due date approaches for the periodic review, the owner receives reminder e-mail notifications from the EDMS requiring owner actions to satisfy the review. These notifications are sent 180, 60, 30, and 7 days before the periodic review due date.

If the periodic review interval was assigned to a document type that has “no mandatory periodic review” requirement, consider deleting the owner-imposed periodic review assignment. A request to remove the non-mandatory periodic review assignment can be e-mailed to DRSC personnel. Once the e-mail is received and processed by DRSC personnel, the periodic review assignment (and e-mail notifications from EDMS) will be eliminated.

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During a periodic review, the owner should first determine if the document is still needed for ICP work. If the document is no longer needed, a DRF should be initiated to cancel the document per Section 4.3.

A deferral for the periodic review can be requested (see deferral time frames in the table above) in unusual circumstances, such as when a process is coming to a close and the periodic review cannot be justified for the short remaining time of the process. The request for deferral is e-mailed to DRSC personnel and includes the deferral timeframe and a deferral justification.

If it is determined the document is still needed, the periodic review should consider all aspects of the document's content for continued accuracy. For example:

1. The document is usable for its intended purpose
2. The document's technical content remains adequate for its intended purpose
3. The document's technical content is accurate and complete
4. The document's use type is correctly identified for its intended purpose (if applicable)
5. Hazards are correctly identified
6. The document is in compliance with source requirements
7. The document's references are correctly identified.

Before the periodic review due date, the owner communicates completion of the review activity by following the steps outlined in Section 4.9 of this procedure or instructions provided on the reminder EDMS e-mail notifications.

Document Field Change Reviews (Section 4.11): The depth of review needed to allow work to immediately continue using a DFC varies upon the nature of the field change:

1. Non-intent: Changes made to procedures beyond minor revisions in the field to clarify the procedure or facilitate performance.
2. Intent: Changes made to procedures in the field that result in changing the technical content of the procedure or altering how the procedure is performed.

At the discretion of the owner/operations management, field changes considered "non-intent" may use an "expedited" DFC review process by obtaining reviews only from a qualified operator, operations management, nuclear facility manager (if applicable), and those disciplines directly affected by the procedure change. Once these reviews have been satisfied and the validation and USQ processes are completed, the DFC can be approved to allow work to immediately continue. Within two weeks of approving the expedited DFC, the owner is responsible to obtain any remaining reviews required by the initial version of the procedure.

Field changes that alter the "intent" of the procedure's performance should not use the expedited DFC review process. See MCP-2985, "Technical Procedures" for more information.

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Appendix D

Procedure Basis

Step	Basis	Source	Citation
All	Documents are reviewed for adequacy, approved for release.....	PRD-5077	Section 1 (DOE O 414.1D) (ASME/NQA-1 ^a)
All	Provide consistent control over the creation, revision, management, and disposition of documents. EDMS provides applications for developing, processing, managing, and distribution controlled documents.	PDD-1012	4.3.5 (ANSI- ISO 14001: 2004)
All	Include provisions for: involvement of appropriate experts, workers, managers in development, review, and validation...; review procedures when appropriate; ensure procedures are not issued prior to...USQ; correct procedure is provided; detect and correct SMP noncompliance.	SAR-100 TSR-100	Chapter 12 AC 5.100.4 (10 CFR 830) (DOE O 422.1)
All	Ensure operation procedures are developed for all anticipated operations, evolutions, test, and abnormal or emergency situations.....	MCP-2985	4.1.1 (DOE O 422.1)
All	The preparation, issue, and change of documents that specify quality requirements or prescribe activities affecting quality will be controlled to ensure that correct documents are being employed.	PRD-5077	4.1.1.1 (ASME/NQA-1 ^a)
All	Identifying, designating, marking, protecting, transmitting, and destroying sensitive unclassified information	LWP-11202	All (DOE M 471.1-1, Chg 1)
All	Documents used to implement design changes are approved and controlled; uniquely identified, include revision and date; revisions are controlled, tracked and completed; pending revisions made available; determine docs to control; define document owners and responsibilities; new and revised docs reviewed prior to distribution; periodically review docs; incorporate changes into docs; limit backlog of changes; identify minor change definition;	PRD-115	Summary (DOE-STD-1073-2003 for Document Control) (ASME/NQA-1 ^a)
All DRF EDMS	Documents shall require that a history of changes to QA documents, including the reasons for the changes, be documented and maintained....will be reviewed each time changes to the document are proposed.	PRD-5077	4.2.4.1; 4.2.4.4C (DOE/RW-0333P)
Sec 2 App A	The documents to be controlled will be identified. ...Shall include documents that specify technical or quality requirements or prescribe activities that are governed by the QARD. The type of document to be used to perform work shall be appropriate.....of the work being performed.	PRD-5077 PRD-5076	4.1.2A; 4.2.1.1 4.2.1.1 (ASME/NQA-1 ^a) (DOE/RW-0333P)
Sec 1.2 App A	Controlled documents shall include, but are not limited to design docs, procurement docs, procedures, instructions, QA program description and requirement docs, and safety analysis reports, including changes thereto.	PRD-5077	4.2.1.1 (DOE/RW-0333P)
Sec. 2	The organization and individuals responsible for the preparation, review, document approval shall be identified.	PRD-5077	4.1.1.3 (ASME/NQA-1 ^a)
4.2 4.11	If an operations procedure is deficient or cannot be followed as written....initiate a change or revision.	MCP-2985	4.7.3 (DOE O 422.1)
4.2	Implementing documents shall define method used to incorporate changes	PRD-5077	4.2.4.3; 4.2.4.4B (DOE/RW-0333P)
4.2 4.11	Initiate procedure changes and revisions when procedure inadequacies or errors are noted in an operations procedure.	MCP-2985	4.3.1 (DOE O 422.1)
4.4 4.5 4.8	Establish procedures to identify existing and potential workplace hazards...; For hazards identifiedduring the development of procedures, controls must be incorporated in the appropriate.....procedure.	PRD-851,	851.21; 851.22 (10 CFR 851)

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Step	Basis	Source	Citation
4.4	All...procedure changes are incorporated when the procedure is revised. Incorporate appropriate information from applicable source documents...	MCP-2985	4.2.1.4; 4.3.5 (DOE O 422.1)
4.4 App D	Documentation of the reason for key procedure steps should be maintained and reviewed... (Procedure Basis)	MCP-2985	4.3.7 (DOE O 422.1)
4.4.1 App A	Operations procedures should conform to the following guidelines...(Procedure Content)	MCP-2985	4.2 (DOE O 422.1)
4.4.1	Operations procedures are divided into use types based on risk associated with their performance. Use Type 1, 2, and 3.	MCP-2985	4.7.8 (DOE O 422.1)
4.4.1	Writer’s guides for defining the format and writing styles to be used to ensure ...accuracy.	DOE-STD-1029-92	Summary
4.4.1 App A	Implementing documents include the following as appropriate: Responsibilities; technical/regulatory requirements; sequential description of work; appropriate level of detail; acceptance criteria; verification/hold points; demonstration of work performed; identification of records.	PRD-5076	4.2.2 (DOE/RW-0333P)
4.4 4.8	Minor changes to documents, such as inconsequential editorial corrections, will not require that the revised documents received the same review and approval as the original documents. To avoid a possible omission of a required review, the type of minor changes that do not require such a review...	PRD-5077	4.1.4.1; 4.2.6.1A-D (ASME/NQA-1 [®]) (DOE/RW-0333P)
4.5–4.8	Documents, including changes thereto, will be reviewed for adequacy and approved for release by authorized personnel including the document owner.	PRD-5077	4.1.1.2; 4.2.4.4A (ASME/NQA-1 [®]) (DOE/RW-0333P)
4.5–4.8	Controlled documents will be reviewed for adequacy, completeness, and approved prior to distribution. Documents that specify technical or QA requirements or prescribe activities that are governed by the QARD, shall be reviewed by the QA organization prior to approval/issuance for correctness, adequacy, and compliance.	PRD-5077	4.1.2.1B; 4.2.2.1; 4.2.2.4E (ASME/NQA-1 [®]) (DOE/RW-0333P)
4.5–4.7	Ensure review, verification, and validation is formalized for written procedures.	MCP-2985	4.1.2; 4.3.8 (DOE O 422.1)
4.5–4.8 4.11	Ensure the review and approval process for each procedure change or revision is documented.	MCP-2985	4.3.3 (DOE O 422.1)
4.5–4.7	Ensure new and revised operations procedures are reviewed prior to initial issue.	MCP-2985	4.5.1 (DOE O 422.1)
4.5 4.9	Issued operations procedures shall be reviewed: Every 5 years; when source doc’s change; after an abnormal event involving the procedure.	MCP-2985	4.5.2 (DOE O 422.1)
4.5.1	Procedures that affect safety-related equipment and emergency procedures ...reviewed by facility safety review committee or...appropriate review mechanism.	MCP-2985	4.4 (DOE O 422.1)
4.5.1	Reviewers shall be technically competent for the subject area of the document being reviewed.	PRD-5077	4.2.2.4D (DOE/RW-0333P)
4.5.1 App C	Changes to documents, except minor changes, will be reviewed and approved by the same organizations that performed the original review unless other organizations are specifically designated. Changes to the document shall be reviewed by those organizations or technical disciplines affected by the change.	PRD-5077	4.1.3.1; 4.2.4.2; 4.2.2.4E (ASME/NQA-1 [®]) (DOE/RW-0333P)
4.5.1 App C	Ensure changes to operations procedures that alter the intent of the procedure receive the same depth of review and level of approvals as would be required by an initial version of the affected sections.	MCP-2985	4.4.5 (DOE O 422.1)
4.5.1	When specified by controlling procedure, the review shall be performed by individuals other than preparer who are trained and qualified in QA practices...	PRD-5077	4.2.2.2; 4.2.2.4C (DOE/RW-0333P)
4.5.1– 4.5.2	Review criteria shall be established before performing the review.	PRD-5077	4.2.2.4A (DOE/RW-0333P)

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Step	Basis	Source	Citation
4.5.2	The individual reviewing controlled document changes will have access to pertinent background data.....	PRD-5077	4.1.3.2; 4.2.2.4B (ASME/NQA-1 ⁸) (DOE/RW-0333P)
4.5.4	During reviews, operations procedures should be compared to source documents	MCP-2985	4.5.3 (DOE O 422.1)
4.5.7	Comments from review shall be documented /resolved to the satisfaction of the organization responsible for the document before approving the doc.	PRD-5077	4.2.2.3; 4.2.2.4F (DOE/RW-0333P)
4.6 4.11	Ensure changes or revisions to operations procedures (excluding minor document changes) are validated...	MCP-2985	4.3.8 (DOE O 422.1)
4.8	The organizational position responsible for approving the document for release shall approve editorial corrections.	PRD-5077	4.2.6.2 (DOE/RW-0333P)
4.8	Ensure procedures are issued from a DRSC....	MCP-2985	4.6.3 (DOE O 422.1)
4.8	Operations procedures shall be approved by the cognizant operations management/document owner.	MCP-2985	4.4.1; 4.4.3; 4.4.4 (DOE O 422.1)
4.8.1	Effective dates will be established for approved implementing documents.	PRD-5077	4.1.2.1D (ASME/NQA-1 ⁸)
4.11	If an activity cannot be performed as listed... and the change process would cause unreasonable delays, then an expedited changed (e-change) may be made.... After the e-change has been authorized, the changes will be processed via normal change process. Implementing docs will describe the process to control e-changes according to: level of mgmt with authority to make e-changes; time limits for processing e-changes through normal change process; evaluation of the work will be performed if the normal review process results in a change that is different from the e-change.	PRD-5077	4.2.5.1 – 4.2.5.1.2.2 (DOE/RW-0333P)
4.11 App C	For procedure “non-intent” changes obtain approval from a qualified operator and a member of Operations management. Document owner concur with changes within two weeks....	MCP-2985	4.4.3; 4.4.4 (DOE O 422.1)
4.11	Correct errors to procedures by drawing a single line...	MCP-2985	4.8 (DOE O 422.1)
4.11	Initiate procedure revisions when a procedure change has been in effect for greater than six months or contains more than five procedure changes. Document shall define the maximum number of changes permitted prior to requiring ...a revision.	MCP-2985 PRD-5077	4.3.4 (DOE O 422.1) 4.2.4.3 (DOE/RW-0333P)
4.11	Document procedure changes...in a location readily available to operations personnel.....Communicate info regarding change to operations personnel	MCP-2985	4.3.2; 4.3.6 (DOE O 422.1)
a. ANSI/ASME NQA-1-2008 with Addenda through NQA-1a-2009, “Quality Assurance Requirements for Nuclear Facility Applications”			