

SUPPLEMENTAL DIRECTIVE

NNSA SD 251.1A

Approved: 1-17-18

DIRECTIVES MANAGEMENT



NATIONAL NUCLEAR SECURITY ADMINISTRATION Management and Budget

CONTROLLED DOCUMENT

OFFICE OF PRIMARY INTEREST (OPI):

AVAILABLE ONLINE AT:

Policy Division

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DIRECTIVES MANAGEMENT

1. **PURPOSE.** The purpose of this Supplemental Directive (SD) is to implement Department of Energy (DOE) Order (O) 251.1D, *Departmental Directives Program*, and to define the formal system to set, communicate, and institutionalize directives (requirements, responsibilities, and procedures) specific to the National Nuclear Security Administration (NNSA).

This SD establishes processes which describe:

- a. Developing, revising, certifying, and cancelling NNSA directives;
- b. Obtaining equivalencies or exemptions to DOE and NNSA directives;
- c. Interfacing with DOE's Departmental Directives Program, processing DOE directives, and developing corporate positions on DOE directives; and
- d. Handling directives that have not been issued through either the DOE or NNSA formal directives processes.

NNSA directives must not duplicate, contradict, delete, or be inconsistent with provisions in any statute, regulation, other NNSA directives, or DOE directives.

2. **AUTHORITY.** NNSA's directive program is established under 50 United States Code (U.S.C.) 2402, *Administrator for Nuclear Security*. This law gives the Administrator authority to establish NNSA-specific policies, unless disapproved by the Secretary. DOE Order 251.1D authorizes headquarters organizations to publish SDs for use by those organizations and their contractors, provided the SDs do not contradict, delete, or duplicate provisions in any applicable Policy, Regulation, Order, or Notice.

3. **CANCELLATIONS.**

- a. NNSA SD 251.1 Admin Change 1, *Policy Letters: NNSA Policies, Supplemental Directives, and Business Operating Procedures*, dated 7-5-11.
- b. Memorandum for the Administrator from Theodore D. Sherry, *Approve Designation of Exemptions and Equivalencies Approval Authority*, dated 1-8-10.

Cancellation of a directive does not modify or otherwise affect any contractual obligation to comply with the directive. Contractor Requirements Documents (CRDs) that have been incorporated into a contract remain in effect throughout the term of the contract until the contract or regulatory commitment is modified to either eliminate outdated requirements or substitute new requirements.

4. APPLICABILITY.

- a. Federal. This SD applies to all NNSA federal organizations.
- b. Contractors. The CRD, provided as Attachments 1-3, sets forth requirements of this directive that apply to contractors. The CRD must be included in contracts of Management and Operating (M&O) contractors performing work for NNSA.
- c. Equivalencies/Exemptions:
 - (1) Equivalency: In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at 50 U.S.C. sections 2406 and 2511, and to ensure consistency throughout the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this Directive for activities under the Director's cognizance, as deemed appropriate.
 - (2) Exemptions: None.

5. SUMMARY OF CHANGES.

- a. Requires senior leadership involvement in every stage of directives development.
- b. Signature authority for Business Operating Procedures (BOPs) is revised.
- c. Authorization Coordinators (ACs) replace Directives Points of Contact.
- d. Field office review of contractor's comments on NNSA directives is eliminated. M&O contractor subject matter experts (SMEs) are limited to commenting on CRDs.
- e. Unofficial directives are defined as documents that apply recurring or long-term requirements to NNSA federal or contractor organizations that have not been reviewed and issued through the DOE or NNSA formal directives processes (e.g., emails and memos, etc.). Unofficial directives do not include communications from Contracting Officers and Contracting Officer's Representatives to contractors or to communications from DOE or NNSA attorneys.
- f. Establishes a disposition process to address unofficial NNSA directives. Unofficial directives must be converted to an NNSA directive approved for conversion by the Chief of Staff.
- g. SMEs are required to explain the rationale for concerns raised as major comments and provide suggestion(s) for addressing those concerns. Major comments without this information will be returned to the SME and the SME's

Authorizing Official for action. The OPI is not obligated to address major comments if the comments are sent in again without this information.

- h. Implementation of an automated, electronic review and comment tool (RevCom) replaces email for coordinating the comment and review process throughout the NNSA nuclear security enterprise.
 - i. Standard Operating Procedures (SOPs) document internal processes within a single NNSA organization.
 - j. Establishes Advance Change Directives (ACDs) as a formal means to convey urgent direction needed to meet statutory, regulatory, or programmatic requirements. ACDs expire on the date an NNSA directive is issued or 12 months after the effective date of the ACD, whichever is earlier.
 - k. The cancellation process is initiated by the Policy Division when the OPI has not taken action to certify, cancel, or revise the directive.
 - l. DOE's directives numbering system is adopted for NNSA directives.
6. BACKGROUND. NNSA directives (SDs, Policies (NAPs), ACDs, BOPs, and SOPs) establish, communicate, and institutionalize mandatory policies, requirements, responsibilities, and procedures specific to NNSA federal organizations and contractors. SDs and NAPs can apply to contractors through Contractor Requirements Documents.

Standard Operating Procedures document internal work processes for federal employees within a single NNSA organization and are mandatory within the organization for which the SOPs are written.

See Appendix A, *Types of NNSA Directives*, for additional information

7. REQUIREMENTS.

a. General.

- (1) The types of directives defined in Appendix A must be used as NNSA's primary means to establish, communicate, and institutionalize policies, requirements, responsibilities, and procedures affecting multiple NNSA organizations.
- (2) The requirements for developing or revising an NNSA directive as defined in Appendix B must be followed.
- (3) The requirements for writing Standard Operating Procedures as defined in Appendix C must be followed.
- (4) The requirements for performing Administrative Changes as defined in Appendix D must be followed.

- (5) The requirements for developing an Advance Change Directive as defined in Appendix E must be followed.
- (6) The requirements for certifying an NNSA directive as defined in Appendix F must be followed.
- (7) The requirements for cancelling an NNSA directive as defined in Appendix G must be followed.
- (8) Directives must not duplicate, contradict, delete, or be inconsistent with provisions in any statute, regulation, other NNSA directives, or DOE directives.
- (9) The requirements in this SD must take precedence over all other NNSA directives with respect to the development, approval, revision, or cancellation of directives.
- (10) Directives must be written using the standardized format and content provided in this SD. (Appendix K)
- (11) Directives must be written to specify requirements without mandating the way to fulfill them; the emphasis of the requirements must be placed on the desired results whenever possible. In instances where the directive must specify the way to fulfill requirements (e.g., to provide adequate protection to workers, the public, or the environment) processes must be documented as attachments, or as stand-alone BOPs when a corresponding SD or NAP does not exist.
- (12) SDs, NAPs, and BOPs must trace to parent requirements defined in laws, regulations, DOE Orders, Memoranda of Understanding (MOU), or Interagency Agreements (IAs), with the exception of requirements established by the Administrator under the authorities provided by the *NNSA Act*. Traceability must be documented in the Authorities section of the directive.
- (13) Requirements for contractors must be provided in the CRD. The CRD must contain all requirements that apply to the contractor and must not refer contractors back to the SD or NAP.
- (14) Directives must be reviewed every 3 years to confirm relevancy and accuracy (Appendix F). The annual schedule listing directives requiring review can be found on the directives website. (Appendix K)
- (15) Unofficial directives must be reported to the Policy Division. The Policy Division will initiate the decision process described in Attachment 2.

b. Implementation of NNSA Directives.

- (1) Requirements in new or revised directives must begin upon issuance within federal organizations, unless otherwise stated in the directive.
- (2) New or revised CRDs attached to NNSA directives must be incorporated into the appropriate contract(s) by the cognizant Contracting Officer(s) in accordance with Department of Energy Acquisition Regulation (DEAR) clause 970.5204-2, *Laws, Regulations, and DOE Directives*, (Dec. 2000).
- (3) Equivalencies must be requested, when appropriate, to substitute an alternative process for implementing a requirement (Attachment 3).
- (4) Exemptions must be requested when not implementing a requirement (Attachment 3).

8. RESPONSIBILITIES.

a. Administrator.

- (1) Approves or cancels NAPs, SDs, and ACDs.
- (2) Approves equivalencies and exemptions.

b. Principal Deputy Administrator. Through the Management Council, renders decisions on impasse issues related to directives that cannot be resolved by the Authorizing Officials of the Office of Primary Interest and NNSA organizations.

c. Chief of Staff. Decides if an unofficial policy should be converted to an NNSA directive or rescinded.

d. Management Council. Discusses impasse issues and recommends resolutions to the Chair of the Management Council (Principal Deputy Administrator).

e. Deputy Administrators, Associate Administrators, Field Office Managers, General Counsel, and the Director of the Office of Cost Estimating and Program Evaluation. Approves the creation, revision, and cancellation of BOPs.

f. NNSA Authorizing Official (AO). The senior executive in an NNSA Organization.

- (1) The responsibilities below cannot be delegated:
 - (a) Approves organization's major comments.
 - (b) Represents the organization's position when impasses occur.

- (c) Provides resources to draft, revise, or comment on directives within prescribed timeframes.
 - (d) Implements new or revised directives.
 - (e) Co-signs memoranda with the Associate Administrator for Management and Budget requesting approval from the Administrator to publish NAPs and SDs for which the AO is the OPI.
- (2) The AO responsibilities below can be delegated to a senior-level direct report (e.g., Chief of Staff, Executive Director, Executive Officer).
 - (a) Initiates development or revision of directives for which the organization is responsible in accordance with the requirements in Appendix B.
 - (b) Approves draft directive before the formal review process is initiated.
 - (c) Works with the Office of General Counsel and the Office of Acquisition and Project Management in developing Contractor Requirements Documents.
 - (d) Reviews directives for which the organization is responsible every 3 years to determine continuing relevance or initiate revision or cancellation.
 - (e) Appoints primary and alternate Authorization Coordinators (ACs) capable of representing the interests of the organization.
 - (f) Approves subject matter experts proposed by the AC to comment on directives prepared by other NNSA and DOE organizations.
 - (g) Authorizes the AC to transmit the organization's comments.
- g. Associate Administrator for Management and Budget.
 - (1) Provides executive-level leadership to, and oversight of, NNSA's system for documenting directives unique to NNSA.
 - (2) Provides executive-level leadership to, and oversight of, the DOE directive development process for NNSA.
 - (3) Establishes policy for developing, revising, and processing NNSA directives.

- (4) Cosigns memoranda with the Office of Primary Interest's AO requesting approval from the Administrator to publish NAPs and SDs.
- h. Deputy Associate Administrator for Management.
 - (1) Approves administrative changes to SDs, NAPs, and BOPs.
 - (2) Decides when a policy document is an SD, NAP, ACD, BOP, or SOP.
- i. Director, Policy Division, Business Services, Management and Budget.
 - (1) General.
 - (a) Serves as the SME on DOE and NNSA directive development for the NNSA nuclear security enterprise.
 - (b) Recommends type of policy document as an SD, NAP, ACD, BOP, or SOP.
 - (2) Manages all aspects of NNSA's system for documenting directives.
 - (a) Establishes procedures for developing, revising, and processing NNSA directives.
 - (b) Manages an automated, electronic tool (RevCom) for coordinating the review and comment process on directives throughout the nuclear security enterprise.
 - (c) Determines the type of revision needed (major revision or administrative change) when existing directives require updating.
 - (d) Recommends approval of administrative changes.
 - (e) Coordinates review of draft NNSA directives with DOE, the Defense Nuclear Facilities Safety Board Representative, and NNSA's Central Technical Authority.
 - (f) Initiates and manages the impasse process for resolving major comments.
 - (g) Initiates and manages the process for converting unofficial directives to NNSA directives, when appropriate.
 - (h) Maintains NNSA's official directives records.
 - (i) Provides training to AOs and ACs.

- (j) Executes responsibilities assigned in SD 410.1A, *Implementation of National Nuclear Security Administration Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*, Chapter 1, Section 5 “NNSA Headquarters Directives Point of Contact,” or successor document.
- (k) Executes responsibilities assigned in SD 450.2 Admin Change 1, *Functions, Responsibilities, and Authorities (FRA) Document for Safety Management*, Section 5, “Change Control,” or successor document.
- (3) Manages the DOE Directive development process for NNSA.
- (4) Manages the process to obtain equivalencies and exemptions to NNSA and DOE directives. (Attachment 3)

j. Office of Primary Interest (OPI).

- (1) Consults with the Policy Division to determine the type of proposed changes (major revision or administrative change) when updating existing directives.
- (2) Adheres to the prescribed formats when developing or revising directives.
- (3) Assembles and chairs the writing team.
- (4) Grants extensions for draft directives during the review and comment period at the request of the Policy Division.
- (5) Completes directives on schedule.
- (6) Documents the basis for resolution of all major comments.
- (7) Notifies the Policy Division when an impasse occurs.
- (8) Works with the NNSA Office of General Counsel and the NNSA Office of Acquisition and Project Management to develop CRDs for NNSA contractors, when necessary.
- (9) Reviews directives every 3 years to verify continuing relevance or determine what action (i.e., certification, revision, or cancellation) is necessary. (Appendixes F and G.)
- (10) Executes responsibilities in Attachment 2 (Unofficial Directives) when necessary.

- k. Authorization Coordinator (AC).
 - (1) Acknowledges responsibilities by signing the appointment memorandum issued by the AO.
 - (2) Completes required directives training.
 - (3) Serves as the organization's administrative liaison to the Policy Division on directives issues.
 - (4) In consultation with the AO or AO Delegate, assigns SMEs to review draft directives.
 - (5) Disseminates draft directives; sets internal deadlines for receiving SME comments.
 - (6) Solicits comments on draft directives from SMEs.
 - (7) Requests due date extensions from the Policy Division when needed.
 - (8) Reviews SME's comments for clarity and relativity to the directive and checks that each comment is labeled as major or suggested.
 - (9) Downgrades major comments that do not meet the major comment definition.
 - (10) Informs the SME of the change; refers disagreements with the SME to the AO or AO Delegate for decision.
 - (11) Refers conflicting comments to the AO or AO Delegate for determining the organization's official position.
 - (12) Obtains approval of major comments from the AO prior to transmission.
 - (13) Transmits the organization's approved comments in RevCom by the established deadline.
- l. Subject Matter Expert (SME).
 - (1) Reviews assigned directives; drafts comments for inclusion in the organization's official comment package.
 - (2) Proposes language to resolve concerns raised in major comments.
 - (3) Enters comments by the established due date.
- m. Central Technical Authority. Executes responsibilities related to the directives process as established in DOE O 410.1, *Central Technical Authority*

Responsibilities Regarding Nuclear Safety Requirements; and SD 410.1A, NNSA CTA Responsibilities Regarding Nuclear Safety Requirements.

- n. Contracting Officers. Incorporate CRDs in M&O contracts without alteration, unless the CRD specifies how alterations are to be determined or approved.
- 9. DEVELOPMENT OR REVISION OF DOE DIRECTIVES. Appendix H. (Reserved)
- 10. ACRONYMS. Appendix I.
- 11. DEFINITIONS. Appendix J.
- 12. REFERENCES. Appendix K.
- 13. CONTACT. Policy Division at 202-586-9479, [NNSA Directives Mailbox](#).

BY ORDER OF THE ADMINISTRATOR:



Frank G. Klotz
Administrator

- 1. Attachment 1: Contractor Requirements Document
- 2. Attachment 2: Unofficial DOE and NNSA Directives
- 3. Attachment 3: Equivalencies and Exemptions for NNSA and DOE Directives
- 4. Appendix A: Types Of NNSA Directives (Flowchart included)
- 5. Appendix B: Development or Revision of NNSA Directives (SDs, NAPs, BOPs) (Flowcharts included)
- 6. Appendix C: Standard Operating Procedures
- 7. Appendix D: Administrative Changes (Flowchart included)
- 8. Appendix E: Advance Change Directives (Flowchart included)
- 9. Appendix F: Certification of NNSA Directives
- 10. Appendix G: Cancellation of NNSA Directives
- 11. Appendix H: Development or Revision of DOE Directives (Reserved)
- 12. Appendix I: Acronyms
- 13. Appendix J: Definitions
- 14. Appendix K: References
- 15. Appendix L: Sample Transmittal Memo to Administrator

ATTACHMENT 1: CONTRACTOR REQUIREMENTS DOCUMENT SD 251.1A, DIRECTIVES MANAGEMENT

1. INTRODUCTION.

This Contractor Requirements Document (CRD) establishes the requirements for National Nuclear Security Administration (NNSA) Management and Operating (M&O) contractors for commenting on NNSA and Department of Energy (DOE) directives and reporting unofficial directives.

M&O contractors are responsible for complying with the requirements of this CRD and for flowing down the requirements of this CRD to subcontractors at any level, to the extent necessary, to certify the contractor's compliance with the requirements.

2. REQUIREMENTS.

a. Commenting on NNSA Directives.

- (1) M&O contractors must review and comment on the CRD attached to any NNSA or field office directive.
- (2) Comments must be limited to the CRD; comments will not be accepted on the body of the directive. Major comments must describe the issue, reason for the major issue, and proposed resolution (i.e., the rationale for concerns raised and suggestions for addressing those concerns).
- (3) Comments must be sent to the Policy Division, Business Services, Management and Budget, NNSA (Policy Division).

b. Commenting on DOE Directives.

- (1) M&O contractors must review and comment on the entire body of DOE directives. Major comments must describe the issue, reason for the major issue, and proposed resolution (i.e., the rationale for concerns raised and suggestions for addressing those concerns).
- (2) Comments must be sent to the Policy Division.

c. Unofficial Directives.

See Attachment 2.

3. RESPONSIBILITIES.

a. Authorizing Official (AO).

- (1) Responsibilities that cannot be delegated:
 - (a) Approves organization's major comments on NNSA CRDs and DOE directives.
 - (b) Represents the organization's position when impasses occur.
 - (c) Provides resources to comment on NNSA CRDs and DOE directives within prescribed timeframes.
 - (d) Implements new or revised directives.
- (2) Responsibilities that can be delegated to a senior-level direct report (e.g., Chief of Staff, Executive Director, Executive Officer).
 - (a) Appoints primary and alternate Authorization Coordinators (ACs) capable of representing the interests of the organization.
 - (b) Approves subject matter experts proposed by the AC to comment on NNSA CRDs and DOE directives.
 - (c) Authorizes the AC to transmit the organization's comments.
 - (d) Authorizes the AC to transmit the organization's recommendations for DOE directives actions.

b. Authorization Coordinator (AC).

- (1) Acknowledges responsibilities by signing the appointment memorandum issued by the AO.
- (2) Completes required directives training.
- (3) Serves as the organization's liaison to the Policy Division on directives issues.
- (4) Assigns subject matter experts (SMEs) to review draft directives, in consultation with the AO or AO Delegate.
- (5) Disseminates draft directives.
- (6) Establishes deadline for receiving SMEs' comments.
- (7) Solicits comments on draft directives from SMEs.

- (8) Obtains due date extensions from the Policy Division, when needed.
- (9) Reviews SMEs' comments for clarity and relativity to the directive and checks that each comment is labeled as major or suggested.
- (10) Downgrades major comments that do not meet the major comment definition.
- (11) Informs the SMEs of the change; refers disagreements with SMEs to the AO or AO Delegate.
- (12) Refers conflicting comments to the AO or AO Delegate for decision.
- (13) Obtains the AO's approval of major comments before transmitting the organization's comments. The AO's approval must be documented in RevCom. If this step is not completed, the organization's comments will not be accepted.
- (14) Transmits organization's approved comments in RevCom.

c. Subject Matter Expert (SME).

- (1) Reviews the NNSA CRD or DOE directive assigned; drafts comments for inclusion in the organization's official comment package.
- (2) Proposes language to resolve concerns raised in major comments.
- (3) Provides comments to the AC.

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ATTACHMENT 2: UNOFFICIAL DOE AND NNSA DIRECTIVES

Note: This attachment applies to NNSA contractor and federal organizations.

1. **BACKGROUND.** Unofficial directives are documents that apply recurring or long-term requirements to NNSA federal or contractor organizations that have not been reviewed and issued through the DOE or NNSA formal directives processes (e.g., emails and memos, etc.). Unofficial directives do not include communications from contracting officers and contracting officer's representatives to contractors or to communications from DOE or NNSA attorneys. Unofficial directives also do not include documents that provide direction for individual or short-term tasks.
2. **REQUIREMENTS.**
 - a. Federal and contractor organizations must send unofficial NNSA- and DOE-originated directives to the Policy Division, Business Services, Management and Budget (Policy Division) for action.
 - b. Unofficial NNSA-originated directives approved for retention must complete the process described in Section 4.c. below.
3. **RESPONSIBILITIES.**
 - a. **Policy Division.**
 - (1) Forwards unofficial DOE-originated directives to DOE's Departmental Directives Program.
 - (2) Executes responsibilities defined in Section 8.i. (Responsibilities), as required.
 - b. **NNSA Chief of Staff.** Decides if an NNSA-originated unofficial directive should be converted to a directive or rescinded.
 - c. **NNSA Office of Primary Interest (OPI).**
 - (1) Rescinds or converts the unofficial directive.
 - (2) Executes responsibilities described in Section 8.j. (Responsibilities) as required.
4. **PROCESS.**
 - a. Federal and contractor organizations must send unofficial NNSA- and DOE-originated directives to the Policy Division via one of the following options:
 - (1) Email to the [NNSA Directives Mailbox](#); or

- (2) Mail anonymously to:
 - U.S. Department of Energy/NNSA
 - 1000 Independence Avenue, SW
 - Management and Budget
 - Business Services
 - Policy Division, NA-MB-22
 - Washington, DC 20585
- b. The Policy Division forwards unofficial DOE-originated directives to DOE's Departmental Directives Program for action.
- c. Disposition of NNSA-originated unofficial directives:
 - (1) The Policy Division notifies NNSA's Chief of Staff when an unofficial NNSA directive is identified.
 - (2) The Chief of Staff consults with the Authorizing Official whose organization issued the unofficial directive, and determines whether to convert to an NNSA directive or rescind.
 - (3) If the determination is to convert into a directive, the AO has 10 days to convert the unofficial directive into an ACD or 60 days to convert the unofficial directive into an official directive.

ATTACHMENT 3: EQUIVALENCIES AND EXEMPTIONS FOR NNSA AND DOE DIRECTIVES

Note: This attachment applies to NNSA contractor and federal organizations.

1. **BACKGROUND.** An equivalency is a proposed alternative to meeting a requirement in a directive; it is a proposed alternative approach to achieving the goal of the directive.

An exemption is the release from one or more requirements in a directive.

This attachment describes the process for requesting equivalencies and exemptions when a Department of Energy (DOE) or National Nuclear Security Administration (NNSA) directive (Supplemental Directive (SD), Policy, and Business Operating Procedure) does not assign approving authority. When a DOE or NNSA directive assigns a process for granting an equivalency or exemption, that process must be followed. If the directive is silent on granting an equivalency or exemption, the process described below, where the Administrator is the approving authority, must be followed.

2. **REQUIREMENTS.**

- a. Equivalencies and exemptions must not be used to circumvent decisions reached by the Secretary, Deputy Secretary, Administrator, or the other Under Secretaries.
- b. Exemptions or equivalencies must:
 - (1) Be consistent with laws and regulations;
 - (2) Provide adequate protection of the public, workers, and the environment; and,
 - (3) Remain consistent with the primary goal and purpose of the directive.
- c. The process in Section 4 must be followed to request exemptions and equivalencies to DOE and NNSA directives unless otherwise specified in the directive.

3. **RESPONSIBILITIES.**

- a. **Under Secretary for Nuclear Security; Administrator, NNSA.**
 - (1) Approves exemptions and equivalencies to DOE directives for NNSA, unless the DOE directive otherwise specifies approval authority.
 - (2) Approves exemptions and equivalencies to NNSA directives unless the NNSA directive otherwise specifies approval authority.

- b. Authorizing Official (AO) of NNSA Office of Primary Interest (OPI) (NNSA Directives). Concurs or non-concurs on exemptions and equivalencies for NNSA directives.
- c. AO of NNSA Functional Organization (DOE Directives). Concurs or non-concurs on exemptions and equivalencies for DOE directives.
- d. AO of NNSA Organization Requesting the Equivalency or Exemption. Initiates the request for, and obtains approval of, exemptions or equivalencies.
- e. Field Office Manager (FOM). Recommends if contractor requests to obtain equivalencies and exemptions should be granted or denied.
- f. Central Technical Authority (CTA). Concurs or non-concurs on exemptions and equivalencies as required by NNSA SD 410.1, *Implementation of National Nuclear Security Administration Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*.
- g. Director, Policy Division, Business Services, Management and Budget.
 - (1) Forwards approvals of exemptions or equivalencies to DOE directives to DOE's Departmental Directives Program.
 - (2) Executes responsibilities defined in Section 8.i. (Responsibilities), as required.

4. PROCESS.

- a. Use the templates for exemption and equivalency memoranda. (Appendix K)
- b. NNSA organization proposing the exemption or equivalency produces a memorandum documenting the basis for the exemption or equivalency that must:
 - (1) Identify the requirement(s) for which the equivalency or exemption is being sought;
 - (2) Explain the equivalency or exemption;
 - (3) Identify the offices or sites for which the equivalency or exemption is being sought;
 - (4) Justify the reason(s) for the equivalency or exemption;
 - (5) Explain why the equivalency or exemption is adequate and in the best interests of the government;
 - (6) Discuss any increase in risk to health, safety, environment, or security;

- (7) In the case of an exemption, describe any mitigating actions that have been, or will be, taken to provide adequate protection of the public, workers, and the environment for the period during which the exemption will be effective;
 - (8) In the case of an equivalency, indicate when compliance will be achieved; and,
 - (9) Confirm applicable laws or regulations are not violated.
- c. Contractor organizations requesting an exemption or equivalency for **DOE and NNSA directives** obtain the responsible Field Office Manager's recommendation if the equivalency or exemption should be granted.
- d. NNSA organization proposing an exemption or equivalency for an **NNSA directive** obtains the concurrence of the NNSA OPI AO and the NNSA CTA (when required).
- e. NNSA organization proposing the exemption or equivalency for a **DOE directive** consults with the DOE OPI and obtains concurrence of the NNSA Functional AO and the NNSA CTA (when required). Obtaining concurrence from the DOE OPI AO is not necessary (DOE O 251.1D, Departmental Directives Program, Appendix E).
- f. If concurrence within NNSA cannot be obtained, the impasse process described in Section 4.j. is used.
- g. Requesting organization and the Policy Division collaborate to write the memorandum that transmits the equivalency or exemption request for approval. (Appendix K)
- h. Policy Division:
 - (1) Assembles the signature package, which includes the transmittal memorandum, the equivalency or exemption memorandum, the FOM's recommendation (when appropriate), the directive, and any additional background documentation required.
 - (2) For equivalencies and exemptions approved by the Administrator for DOE and NNSA directives:
 - (a) Obtains concurrences from the NNSA Functional AO and the NNSA CTA (when required) on the signature package.
 - (b) Obtains the signature of the Associate Administrator for Management and Budget and the requesting organization's AO on the transmittal memo to the Administrator. (Appendix L)

- (c) Delivers the signature package to NNSA's Executive Secretariat for transmittal to the Administrator.
 - (d) After the Executive Secretariat returns the package, notifies the NNSA OPI or Functional Organization, the requesting organization, and the CTA (when required) that the exemption or equivalency has been approved or denied.
 - (e) Forwards approvals of exemptions or equivalencies for DOE directives to the Departmental Directives Program and provides copies to the requesting organization, and the NNSA OPI or Functional Organization.
 - (f) Proceed to step (3)(d).
- (3) For equivalencies and exemptions approved by the NNSA OPI AO:
 - (a) Obtains concurrence from the NNSA CTA, when required.
 - (b) Obtains the signature of the requesting organization's AO on the transmittal memo to the OPI AO.
 - (c) Delivers the signature package to the OPI AO for approval.
 - (d) Processes an administrative change (Appendix D) to add the equivalency or exemption to the directive.
 - (e) Posts the approval memorandum and the revised directive on the Directives Portal.
 - (f) Notifies all Authorizing Officials, AO Delegates, and Authorization Coordinators that the memorandum and directive are available on the Directives Portal.
- i. When an NNSA or DOE directive for which NNSA is the OPI is revised, the OPI must consult with the requesting organizations to determine if existing exemptions or equivalencies should remain in the directive. If an equivalency or exemption is still valid, the OPI updates the equivalency and exemption section when revising the directive.
- j. Impasse Process for Equivalencies and Exemptions (if needed).
 - (1) Organization requesting the exemption or equivalency notifies the Policy Division that agreement cannot be reached with the NNSA OPI AO, NNSA Functional AO, or the CTA (when required).

- (2) Requesting organization, the Policy Division, OPI or Functional Organization, and the responsible Field Office (when appropriate) collaborate to prepare a brief summary of the impasse issues.
- (3) Policy Division requests a meeting with the Principal Deputy Administrator and the AOs of the OPI or NNSA Functional organization, the requesting organization, responsible FOM (when appropriate), and the CTA (if required). The Policy Division sends the summary and the memorandum requesting the equivalency or exemption to the Principal Deputy Administrator's office prior to the meeting.
- (4) Requesting organization and the Policy Division collaborate to develop a record of decision, which documents the results of the meeting with the Principal Deputy Administrator. The Policy Division provides a copy of the record of decision to the OPI or Functional Organization, the requesting organization, the FOM (when appropriate), and the CTA (when required).

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APPENDIX A: TYPES OF NNSA DIRECTIVES

1. **BACKGROUND.** National Nuclear Security Administration (NNSA) directives consist of Supplemental Directives (SDs), Policies (NAPs), Advance Change Directives (ACDs), Business Operating Procedures (BOPs), and Standard Operating Procedures (SOPs). Directives are used to establish, communicate, and institutionalize policies, requirements, responsibilities, and procedures specific to NNSA federal organizations and Management and Operating (M&O) contractors.

To illustrate the decision process, a flowchart follows the last page of this appendix.

SDs, NAPs, ACDs, and BOPs are mandatory, carry equal weight, and affect more than one NNSA organization.

Standard Operating Procedures document internal work processes within a single NNSA organization. SOPs are often referred to as process descriptions, office procedures, work instructions, procedural notes, etc. SOPs are used within individual organizations.

The processes for developing NNSA directives are covered in this SD's Appendix B (SDs, NAPs, BOPs) and Appendix E (ACDs). A flowchart depicting the decision process of selecting between an SD, NAP, ACD, BOP, or SOP follows this appendix.

2. **REQUIREMENTS.**

- a. **General.**

- (1) NNSA directives must not duplicate, contradict, delete, or be inconsistent with provisions in any statute, regulation, other NNSA directives, or DOE directives.
- (2) SDs, NAPs, and BOPs apply to two or more NNSA federal organizations.
- (3) SDs, NAPs, and BOPs must be reviewed by the OPI every 3 years to determine continued relevance or if revision or cancellation is necessary. (Appendix F, Certification of NNSA Directives or Appendix G, Cancellation of NNSA Directives.)

- b. **Supplemental Directive (SD):**

- (1) Is signed by the Administrator.
- (2) Augments policies, requirements, and responsibilities covered in a DOE directive or technical standard.
- (3) Tailors requirements and responsibilities to NNSA. (NNSA can add requirements and responsibilities without DOE approval. If lessening

requirements, the process in Attachment 3 must be followed before initiating DOE's equivalency and exemption process.)

- (4) Traces to parent requirements in DOE Orders. In addition, may also trace to requirements in laws, regulations, Memoranda of Understanding (MOU), or Interagency Agreements (IAs).
- (5) Addresses requirements **or** requirements *and* the process for accomplishing those requirements. Processes that are addressed must include associated flowcharts in an appendix to the SD.
- (6) Applies requirements and responsibilities to M&O contractor organizations through an attachment (Contractor Requirements Document (CRD)) that is placed on the M&O contract.

c. NNSA Policy (NAP):

- (1) Is signed by the Administrator.
- (2) Establishes policies, requirements, and responsibilities unique to NNSA that are traceable to parent requirements in laws, regulations, MOUs, or IAs, with the exception of requirements established by the Administrator under the authorities provided by the *NNSA Act*.
- (3) Focuses on a subject area not covered by a DOE directive or technical standard.
- (4) Addresses requirements **or** requirements *and* the process for accomplishing those requirements. Processes that are addressed must include associated flowcharts in an appendix to the NAP.
- (5) Applies requirements and responsibilities to M&O contractor organizations through an attachment (CRD) that is placed on the M&O contract.

d. Advance Change Directive (ACD):

- (1) Is signed by the Administrator.
- (2) Issues policy of a continuing nature affecting two or more NNSA federal organizations.
- (3) Conveys urgent direction needed to meet statutory, regulatory, or programmatic requirements, or deadlines.
- (4) Disseminates policy in a shorter timeframe than it takes to write, review, and approve an NNSA directive.

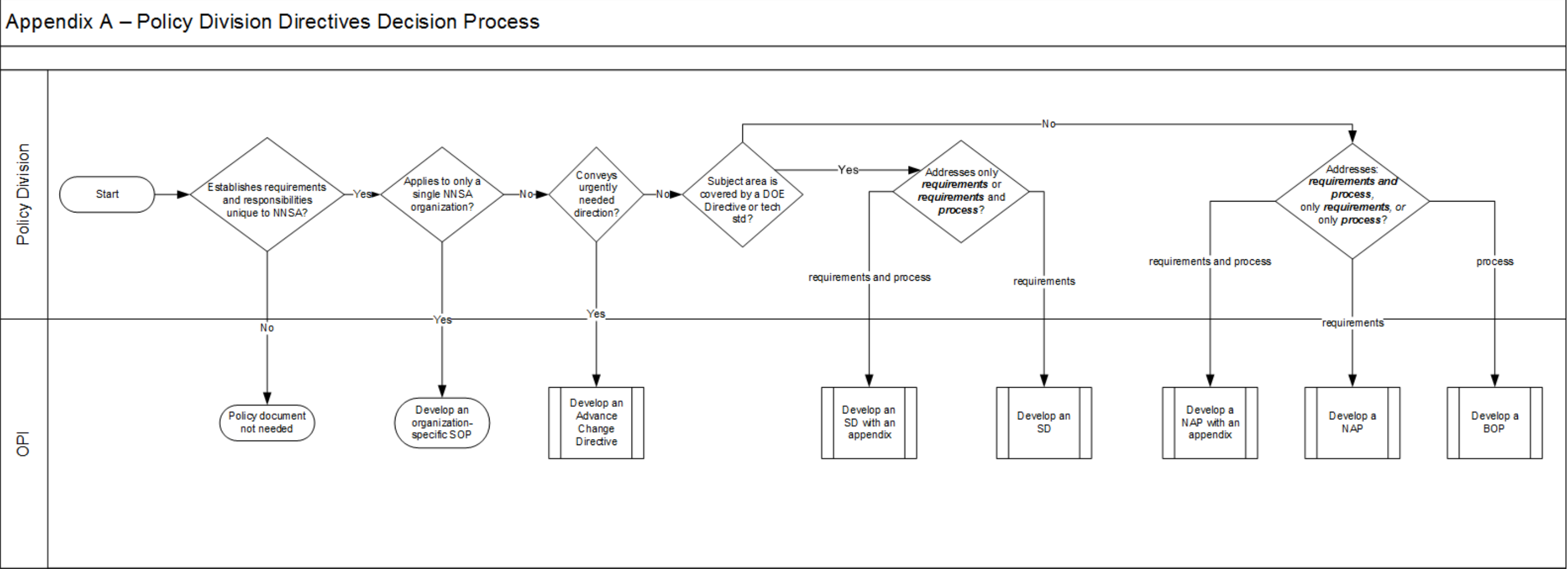
- (5) Expires upon the effective date of the permanent directive or 12 months after the effective date of the ACD, whichever is earlier.

e. Business Operating Procedure (BOP):

- (1) Is signed by the OPI's Authorizing Official (Deputy Administrator, Associate Administrator, Field Office Manager, General Counsel, or the Director, Office of Cost Estimating and Program Evaluation) in the programmatic, functional, or field areas issuing the BOP.
- (2) Addresses a process to accomplish requirements in subject areas not covered by an SD or NAP.
- (3) Establishes business procedures that are traceable to a law, regulation, MOU, or IA, with the exception of requirements established by the Administrator under the authorities provided by the *NNSA Act*.
- (4) Includes flowcharts of the process being defined.

f. Standard Operating Procedure (SOP):

- (1) Cannot be used to circumvent the equivalency and exemption process.
- (2) Establishes business procedures that apply to a single NNSA federal organization.
- (3) Addresses a process within a single NNSA federal organization.
- (4) Is approved by the program, functional, or field manager at the lowest level possible within an organization.



APPENDIX B: DEVELOPMENT OR REVISION OF NNSA DIRECTIVES (SDs, NAPs, BOPs)

1. **BACKGROUND.** National Nuclear Security Administration (NNSA) directives consist of Supplemental Directives (SDs), Policies (NAPs), Advance Change Directives (ACDs), and Business Operating Procedures (BOPs). Directives are used to establish, communicate, and institutionalize policies, requirements, responsibilities, and procedures specific to NNSA federal organizations and contractors.

To illustrate the processes described in this appendix, a set of flowcharts is included as the last pages of the appendix.

NAPs, SDs, and BOPs are mandatory carry equal weight, and affect more than one NNSA organization. Although each of these directives has different levels of approval, all have the same review and comment process described in this appendix.

ACDs are also mandatory, carry the same weight as an SD, NAP, or BOP, and affect more than one NNSA organization. Appendix E describes the process for developing an ACD.

High level flowcharts depicting the processes described herein follow this appendix.

2. **REQUIREMENTS.**
 - a. Process described in Appendix D must be followed when administrative changes are made to NAPs, SDs, and BOPs.
 - b. NAPs and BOPs must be numbered according to Department of Energy's (DOE) numbering system as described in the *Crosswalk of Directives Numbering System*. SDs must be numbered according to the DOE Order being supplemented.
 - c. SDs, NAPs, ACDs, and BOPs must trace to parent requirements defined in laws, regulations, DOE Orders, Memoranda of Understanding, or Interagency Agreements, with the exception of requirements established by the Administrator under the authorities provided by the *NNSA Act*.
 - d. SDs and NAPs that impose requirements on contractors must contain a Contractor Requirements Document (CRD) as Attachment 1 to the directive.
 - e. The following Naval Reactors equivalency must be added to all NNSA directives:

In accordance with the responsibilities and authorities assigned by Executive Order 12344, codified at 50 United States Code, sections 2406 and 2511, and to ensure consistency throughout the joint Navy/DOE Naval Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices

pertaining to this directive for activities under the Director's cognizance, as deemed appropriate.

3. PROCESS.

a. Development of Review and Comment Draft.

- (1) OPI consults with the Policy Division, Business Services, Management and Budget (Policy Division) after the need to develop or revise a directive is identified.
- (2) Policy Division:
 - (a) Confirms there is no overlap or conflict with existing directives;
 - (b) Recommends whether the proposed directive is an SD, NAP, or BOP; and
 - (c) Determines if the proposed revision of an existing directive is administrative in nature.
 - 1 Administrative changes (e.g., typographical errors, organizational name changes, reference changes, and the addition of minimal content, as determined by the Deputy Associate Administrator for Management) do not alter the directive's requirements or responsibilities and do not need to be distributed for review. (Appendix D)
 - 2 Non-administrative changes must be distributed for full review because changes alter the directive's requirements or responsibilities or add substantial content. This process is described in the steps below.
- (3) OPI must establish a writing team:
 - (a) Exemptions to the writing team requirement can be requested from the Policy Division.
 - (b) Writing team is chaired by the OPI.
 - (c) Writing team members must represent a cross-section of subject matter experts (SMEs) and senior management with representatives from at least half of the program offices affected, one field office employee, and the appropriate NNSA counsel.
 - (d) Contractor subject matter experts (SMEs) may be part of the writing team at the discretion of the OPI, but must not be involved in final policy decisions.

- (4) OPI must consult with the technical editor assigned by the Policy Division to refine the initial draft of the directive.
- (5) OPI sends the following items to the [NNSA Directives Mailbox](#) for review when the OPI and the technical editor agree that the draft is ready for distribution:
 - (a) Microsoft Word file of the draft directive, including appropriate attachments, appendixes, etc.
 - (b) Justification for creating the directive. The justification must include statutory or other drivers, identify any known significant costs, and list the organizations and individuals that were involved in the directive's development.
 - (c) Approval from the OPI's Authorizing Official (AO) that the draft is ready to be distributed for review.

b. Review and Comment.

- (1) The Policy Division establishes the due date for receiving comments.
- (2) The draft is distributed via RevCom to NNSA's AOs, AO Delegates, and Authorization Coordinators (ACs), the Department's Representative to the Defense Nuclear Facilities Safety Board (DNFSB), and the NNSA Central Technical Authority (CTA). NAPs and SDs are also distributed to DOE for review.
- (3) ACs and the respective AO or AO Delegate must identify SMEs within the organization to review the draft directive.
- (4) ACs and the AOs or AO Delegates have discretion to ask M&O contractor SMEs to review the entire body of a directive. Contractor-originated comments that are accepted by AOs must be entered and defended by the federal organizations.
- (5) ACs distribute the draft directive to SMEs for review and comment.
- (6) SMEs provide comments by the due date set by the AC. If needed, ACs can request a due date extension from the Policy Division via the [NNSA Directives Mailbox](#).
 - (a) SMEs must categorize comments as either major or suggested.
 - (b) SMEs must contact the OPI to clarify any questions the SMEs have related to potential major comments.

- (c) Major comments from SMEs must contain the following information: a description of the issue, reason for the major issue, and proposed resolution (i.e., the rationale for concerns raised and suggestions for addressing those concerns).
- (7) ACs must review SMEs' comments for clarity and relativity to the directive and must also check that each comment is labeled as major or suggested.
- (8) When SMEs' comments do not meet the definition of a major comment, the AC must change the comment to suggested.
- (9) When comments are changed, the AC must inform the SME. If the SME disagrees with the change, the issue is raised to the AO or AO Delegate for decision.
- (10) ACs must obtain approval from the AO before transmitting the organization's official comments. The AO's approval must be documented in RevCom. If this step is not completed, the organization's comments will not be accepted.

Note: Classified directives must not be entered into RevCom or be transmitted by unclassified email systems. Classified directives must be distributed as paper copies that are marked and controlled, or transmitted through classified email systems. The Policy Division provides instructions on distributing the draft. The Policy Division also instructs the intended recipients on securing a copy of the draft when it cannot be transmitted through or posted on classified messaging or collaborative portal systems. The OPI can post an unclassified version of the directive in RevCom.

c. Comment Resolution.

- (1) Policy Division must return major comments from SMEs which do not contain the justification information required in the Review and Comment Section to the SME and the SME's AO, AO Delegate, and AC for action. The OPI is not obligated to address the SME's major comments if the comments are re-sent without the required information.
- (2) OPI reviews the comments received from all NNSA organizations.
- (3) OPI must respond to major comments that include language to improve the directive.
- (4) OPI must address **suggested** comments in one of the following ways:

- (a) Accept the comment without change,
 - (b) Accept the comment with modification, or
 - (c) Reject the comment.
 - (d) The OPI is not obligated to obtain the SME's concurrence on the resolution of suggested comments.
- (5) OPI must address **major** comments in one of the following ways:
- (a) Accept the comment without change,
 - (b) Accept the comment with modification, or
 - (c) Reject the comment.
 - (d) In the latter two cases, the OPI must obtain concurrence from the SME.
- (6) OPI must document in RevCom the SME's concurrence on the resolution of major comments.
- (7) Proceed to the Post-Comment Resolution Review section (10) after major comments have been resolved to the satisfaction of both the OPI and SME.
- (8) Proceed to the Impasse Process section below if major comments cannot be resolved.
- (9) Impasse Process for Comment Resolution (if needed).
- (a) Policy Division facilitates discussions between the OPI and the SME when a major comment cannot be resolved.
 - (b) If this effort fails, the Policy Division facilitates a meeting between the OPI's Office Director and the SME's Office Director. If resolution cannot be achieved at the Office Director level, the Policy Division elevates discussions up the OPI's and SME's executive management chains until agreement is achieved. Elevating discussions continues until the disagreement reaches the OPI's and SME's AO.
 - (c) In the event that the AOs cannot reach resolution, the impasse is elevated to the Management Council for discussion and decision by the Principal Deputy Administrator (as chair of the Management Council).

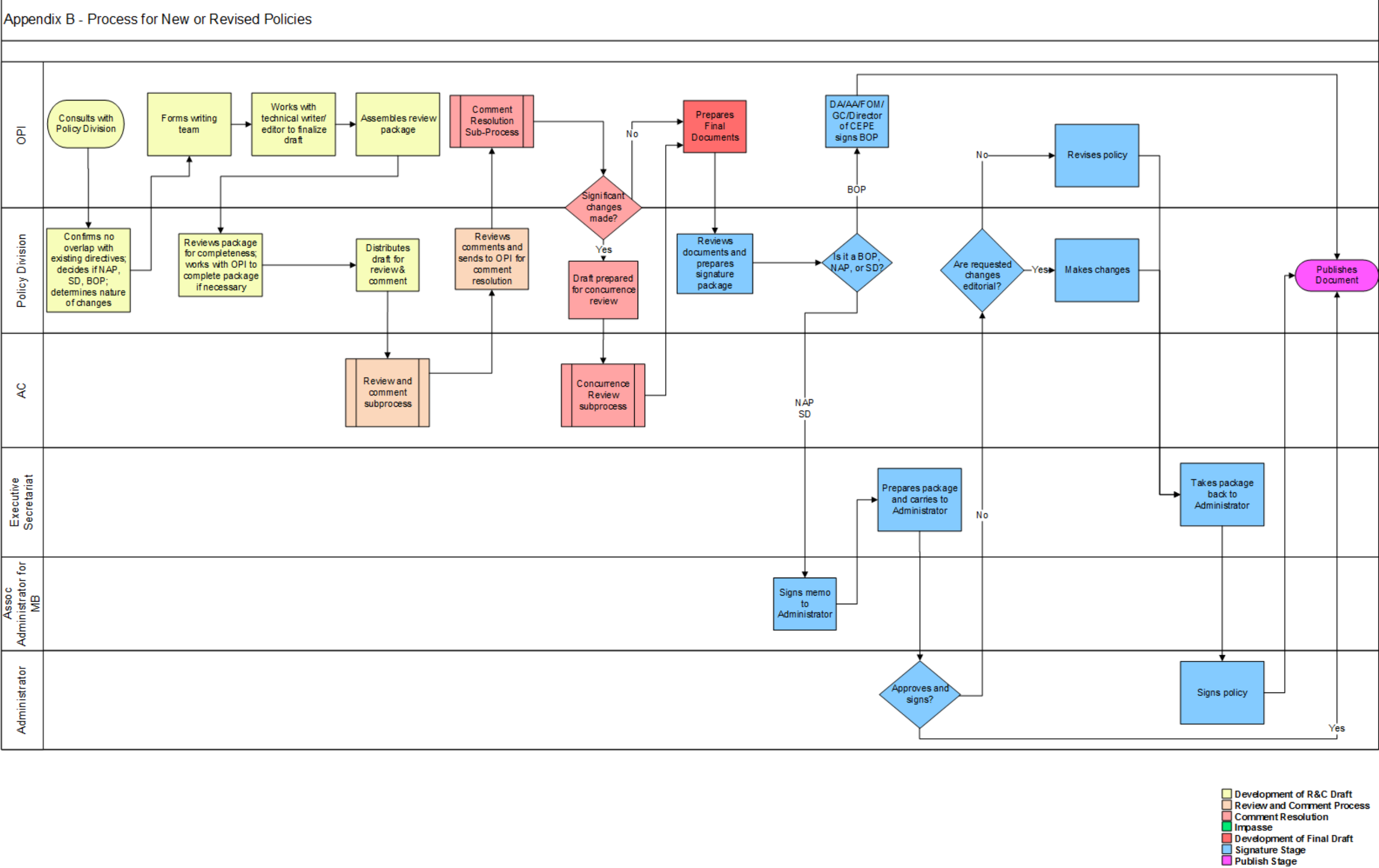
- (d) OPI collaborates with the Policy Division to prepare a brief summary of the impasse that describes the OPI's and SME's positions; the summary must be signed by the OPI's AO. The OPI must also obtain concurrence from the SME's AO on the summary.
 - (e) Policy Division requests a meeting with the Management Council for the OPI's and SME's AOs. The OPI sends the summary and any required paperwork to the Policy Division for transmittal to the Management Council prior to the meeting.
 - (f) OPI collaborates with the Policy Division to develop a record of decision (a simple memo to file) which documents the Management Council's discussion and the Principal Deputy Administrator's decision. The Policy Division provides a copy of the record of decision to the SME's AO, AO Delegate, AC, and the SME. The OPI revises the directive to reflect the record of decision.
- (10) Post-Comment Resolution Review (if needed).
- (a) Policy Division determines, in consultation with the OPI, if changes made to the directive resulting from the comment resolution stage were administrative or substantive in nature. Proceed to Appendix D when the changes are administrative.
 - (b) Directive is distributed via RevCom to each NNSA organization's AC, AO, and AO Delegate for a concurrence review if significant changes were made to the directive to address comments received. The review period is 2 weeks; only major comments will be accepted.
 - (c) Return to the Review and Comment and Comment Resolution sections.

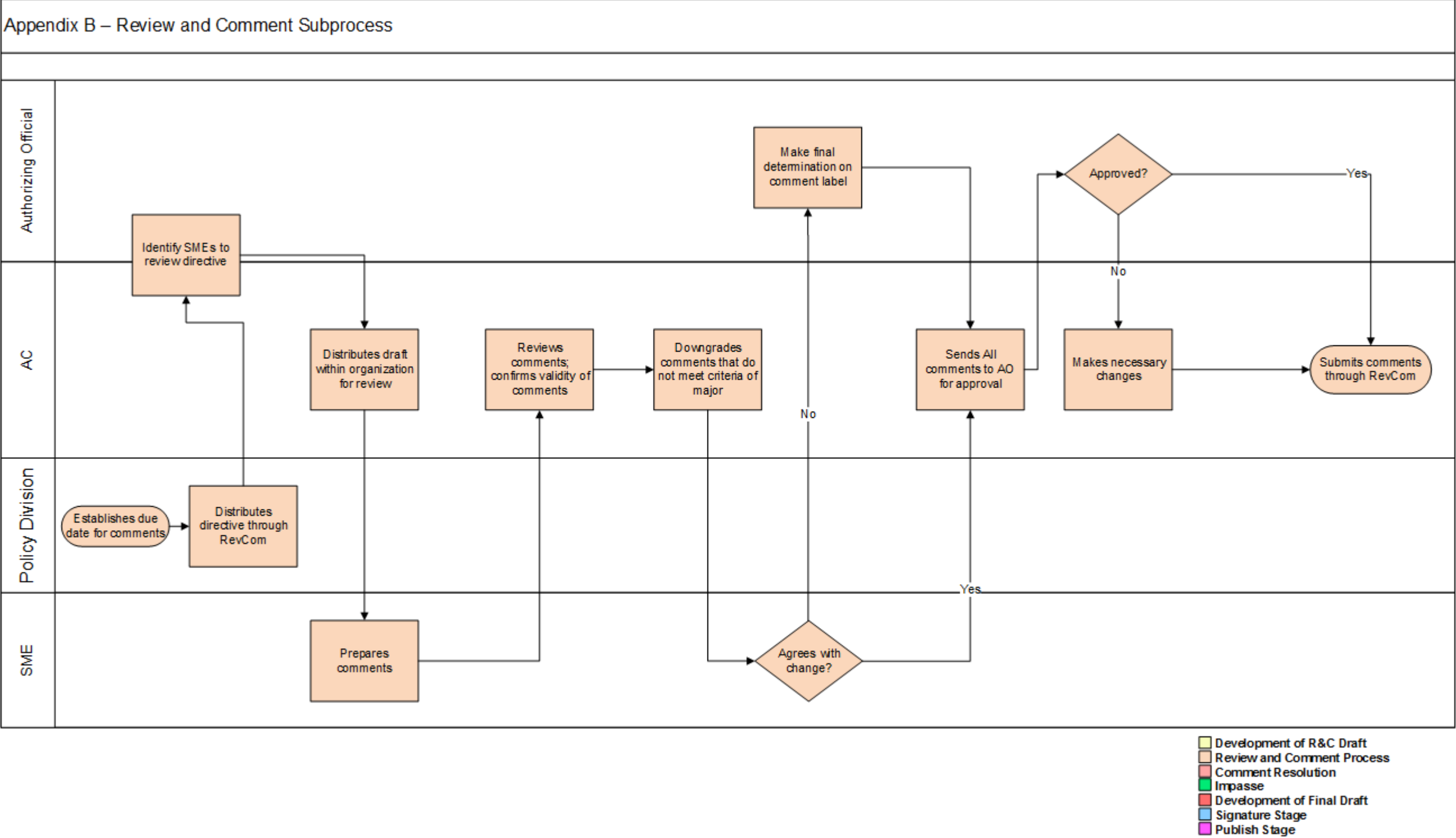
d. Development of the Final Draft.

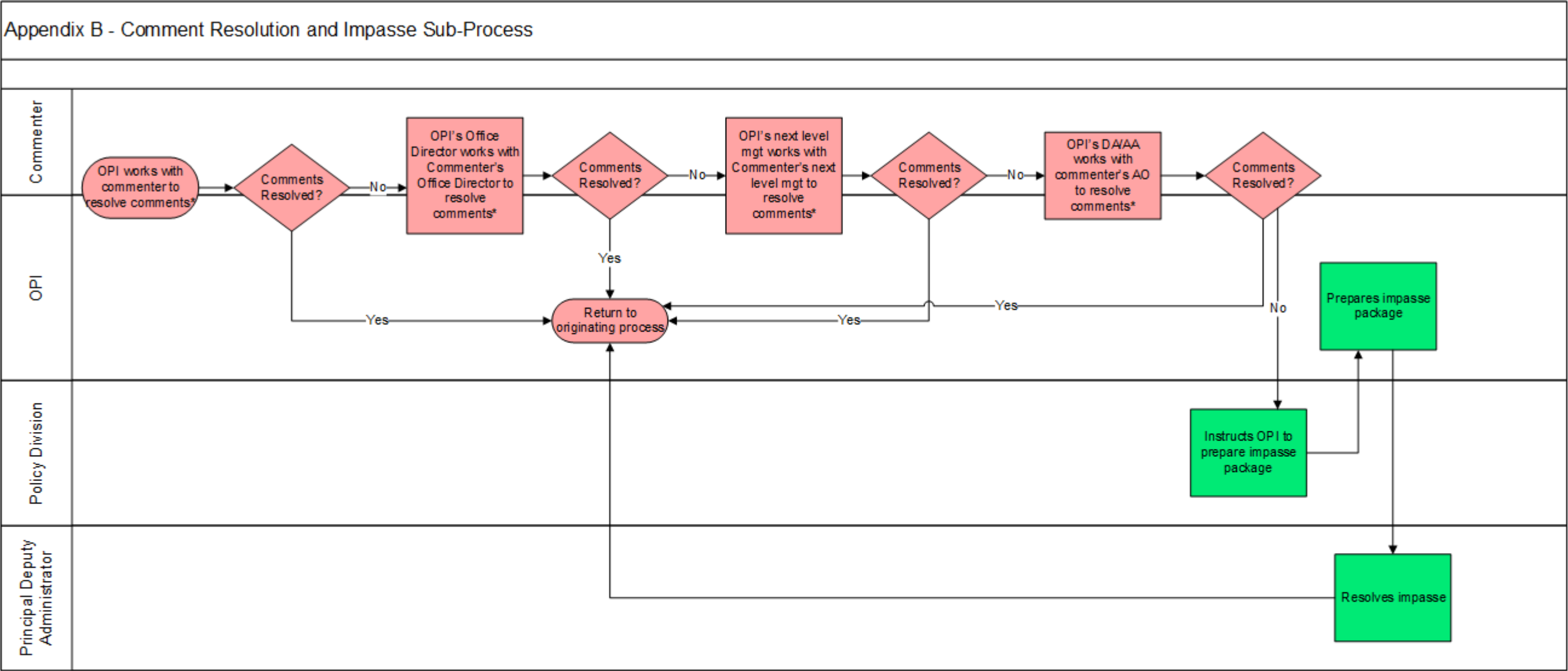
- (1) After the comment resolution step and the impasse step (if needed) are complete, the OPI sends the following documents to the [NNSA Directives Mailbox](#):
 - (a) Comment resolution matrix from RevCom, which documents the resolution of major comments.
 - (b) Documentation confirming SMEs concurred on how major comments were resolved.

- (c) Redlined Microsoft Word version of the draft directive (including appropriate attachments, appendixes, etc.).
 - (d) Record of decision documenting the Management Council Meeting and the resulting Principal Deputy's decision.
 - (2) Policy Division reviews the documents for completeness. If any information is missing, the Policy Division works with the OPI to finalize the directive package for signature.
- e. Signature.
 - (1) NAPs and SDs:
 - (a) OPI and the Policy Division collaborate to write the memo that transmits the directive to the Administrator. (Appendix L)
 - (b) Policy Division:
 - 1 Assembles the signature package, which includes the transmittal memo, a clean copy of the final draft directive, the comment resolution report, a concurrence page, and any background documentation in eDocs.
 - 2 Obtains the signatures of OPI's AO and the Associate Administrator for Management and Budget on the transmittal memo.
 - 3 Delivers the signature package to NNSA's Executive Secretariat for transmittal to the Administrator.
 - (c) Executive Secretariat returns the signed package to the Policy Division for processing. Policy Division notifies the OPI that the directive has been signed and proceeds to publish the directive.
 - (d) Policy Division works with the OPI to determine the path forward to address the Administrator's concerns if the directive is not approved.
 - (2) BOPs: Policy Division obtains the signature of the responsible AO for the finalized directive.
- f. Publish.
 - (1) The Policy Division places a sunset date on the title page of the directive prior to posting it.

- (2) Policy Division posts current and archived NNSA directives on the NNSA directives website. (Appendix K)
- (3) The OPI and NNSA's ACs, AOs, and AO Delegates are notified through RevCom that the directive has been published and is available on the directives website. (Appendix K)
- (4) Policy Division will inform the NNSA workforce upon directive issuance and via quarterly updates on new, revised, and cancelled directives.







*Policy Division Assists OPI with brokering resolution for major comments

- Development of R&C Draft
- Review and Comment Process
- Comment Resolution
- Impasse
- Development of Final Draft
- Signature Stage
- Publish Stage

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APPENDIX C: STANDARD OPERATING PROCEDURES

1. **BACKGROUND.** Standard Operating Procedures (SOPs) document internal work processes within a single National Nuclear Security Administration (NNSA) federal organization. SOPs are often referred to as process descriptions, office procedures, work instructions, procedural notes, etc.

SOPs cannot be used to contradict or delete provisions in any statute, regulation, DOE directive, or NNSA directive (i.e., higher level policy). SOPs cannot be used to circumvent the equivalency and exemption process.

Questions regarding SOPs should be directed to Management and Budget's Quality Management (NA-MB-1.2).

A sample format is located on the directives website. (Appendix K)

2. **REQUIREMENTS.**

- a. Each NNSA organization must develop a written methodology for issuing SOPs.
- b. Minimum elements that must be included in NNSA SOPs are:
 - (1) Number
 - (2) Title
 - (3) Effective date
 - (4) Review date (effective date plus 3 years)
 - (5) Revision history
 - (6) Process owner
 - (7) Overview (purpose, scope, metrics)
 - (8) Requirements (laws, regulations, directives, policies, operational plans, etc., that drive the requirement for this SOP)
 - (9) Steps of the procedure, who performs them, and when
 - (10) Quality Records (records to be maintained in accordance with NNSA Supplemental Directive 243.1, *Records Management Program*)
 - (11) Approval (signature of approving official)
- c. Organization employees must be able to access approved, unclassified SOPs. Appropriate organization employees must be able to access approved, restricted SOPs.

- d. Each NNSA organization must maintain records of their SOPs.

3. RESPONSIBILITIES.

Authorizing Official.

- (1) Establishes a process for approving and implementing SOPs within the organization.
- (2) Selects the format for the organization's SOPs.
- (3) Makes SOPs available electronically to employees, as appropriate.
- (4) Reviews SOPs on a periodic basis, not to exceed every 3 years.
- (5) Delegates the responsibilities above (1-4), as appropriate.

APPENDIX D: ADMINISTRATIVE CHANGES

1. **BACKGROUND.** Administrative changes are edits that add minimal content and do not alter requirements or responsibilities in the affected directive, as determined by Deputy Associate Administrator for Management. Examples are (a) typographical errors; (b) changes to organization names or titles of officials; (c) clarifications of intent in response to feedback received; or (d) changes in law or legal citations.

To illustrate the process described in this appendix, a flowchart is included as the last page.

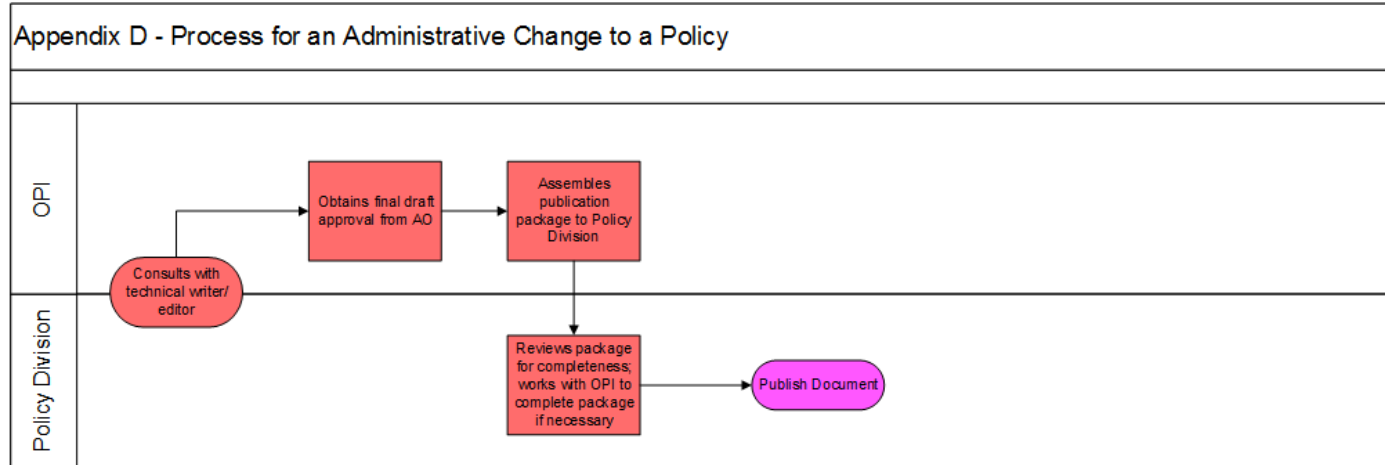
2. **PROCESS.**

- a. **Final Draft.**

- (1) Office of Primary Interest (OPI) must consult with the technical editor assigned by the Policy Division to refine the draft directive that incorporates the administrative change.
 - (2) OPI sends the following items to the [NNSA Directives Mailbox](#) when the OPI and technical editor agree that the draft National Nuclear Security Administration (NNSA) directive is ready for publication.
 - (a) Redlined Microsoft Word file of the draft NNSA directive (including appropriate attachments, appendixes, etc.).
 - (b) Approval from the OPI's Authorizing Official (AO) that the draft is ready for publication.
 - (3) Policy Division reviews the documents for completeness. If any information is missing, the Policy Division works with the OPI to finalize the package for publication.

- b. **Publish.**

- (1) Policy Division places the NNSA seal on the signature page in lieu of a signature.
 - (2) Policy Division places a sunset date on the title page of the directive prior to posting it.
 - (3) Policy Division posts current and archived NNSA directives on the NNSA directives website. (Appendix K)
 - (4) The OPI, NNSA's ACs, AOs, and AO Delegates are notified through RevCom that the directive has been published and is available on the directives website. (Appendix K)



- Development of R&C Draft
- Review and Comment Process
- Comment Resolution
- Impasse
- Development of Final Draft
- Signature Stage
- Publish Stage

APPENDIX E: ADVANCE CHANGE DIRECTIVES

1. **BACKGROUND.** Advance Change Directives (ACDs) are temporary directives the Administrator uses to issue immediate direction to more than one National Nuclear Security Administration (NNSA) organization.

To illustrate the process described in this appendix, a flowchart is included as the last page.

2. **REQUIREMENTS.**
 - a. ACDs must be used only to convey direction needed to meet statutory, regulatory, or programmatic requirements that are exigent in nature.
 - b. Issuing directives through ACDs must be the exception, not the rule.
 - c. The responsible Office of Primary Interest (OPI) must either incorporate the ACD into an existing NNSA directive [Supplemental Directive (SD), Policy (NAP), or Business Operating Procedure (BOP)] or convert it to a new directive as soon as possible and no later than 12 months after the ACD is issued.
 - d. ACDs must expire on the date the replacement directive is issued or 12 months after the effective date of the ACD, whichever is earlier.
 - e. The process described below must be followed for developing and issuing ACDs.

3. **PROCESS.**

- a. **Development of First Draft.**
 - (1) OPI consults with the Policy Division, Business Services, Management and Budget (Policy Division) after the need to develop an ACD is identified.
 - (2) OPI drafts the ACD that will be signed by the Administrator.
 - (3) OPI must consult with the technical editor assigned by the Policy Division to refine the initial draft.
 - (4) OPI sends the following items to the [NNSA Directives Mailbox](#) for review after the OPI and the technical editor agree that the draft ACD is ready for the Administrator's signature:
 - (a) Microsoft Word file of the draft ACD.
 - (b) Approval from the OPI's Authorizing Official (AO) that the draft is ready for the Administrator's signature.

- (5) Policy Division reviews the draft ACD for completeness. If any information is missing, the Policy Division works with the OPI to finalize the ACD for the Administrator's signature.

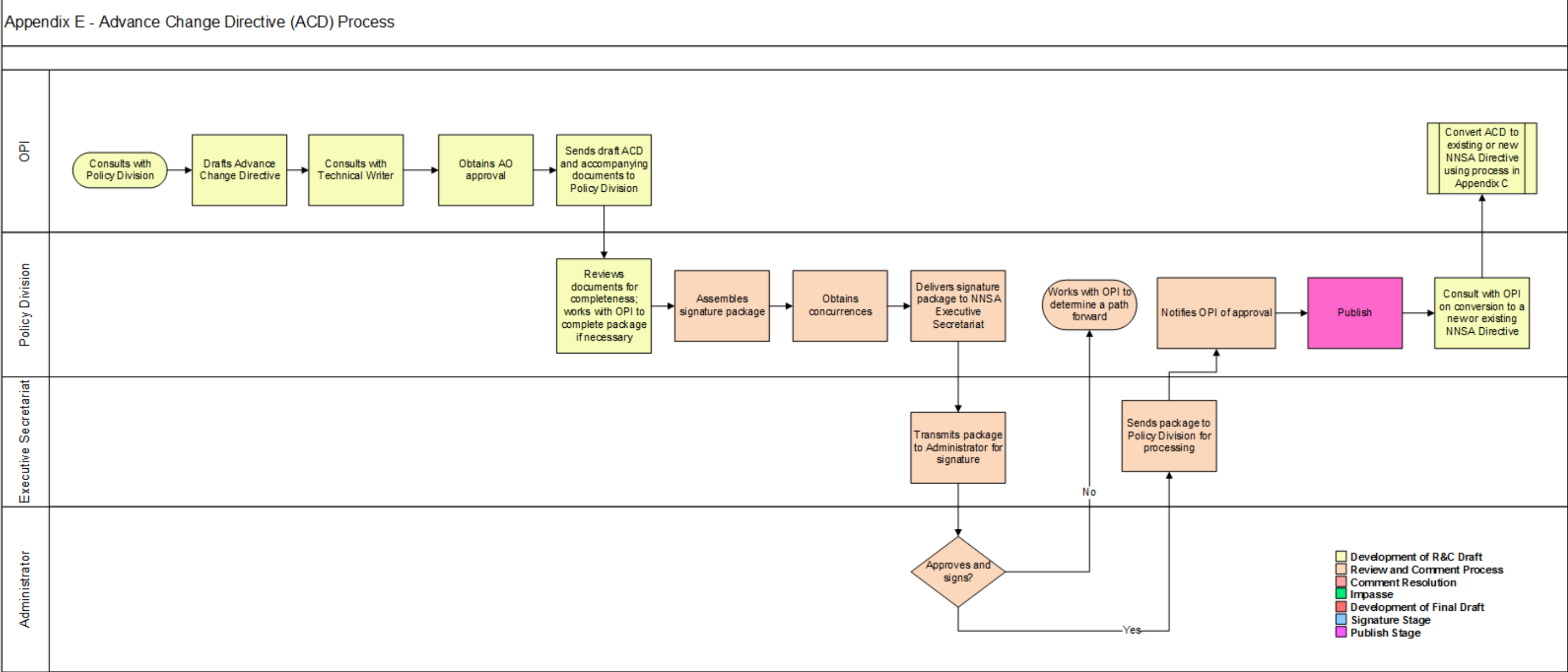
b. Signature.

- (1) Policy Division assembles the signature package, which includes a memo to the Administrator requesting approval of the ACD. The OPI collaborates with the Policy Division to write the memo.
- (2) Policy Division obtains concurrences from the AOs of affected NNSA organizations and the Office of General Counsel on the memo requesting the Administrator's signature on the ACD. The Policy Division also obtains the Associate Administrator for Management and Budget's and the OPI AO's signatures on the transmittal memo to the Administrator.
- (3) Policy Division delivers the signature package to the NNSA Executive Secretariat for transmittal to the Administrator.
- (4) Executive Secretariat returns the signed ACD to the Policy Division for processing.
- (5) Policy Division notifies the OPI that the ACD has been approved, sets an expiration date 12 months from the date of signature.
- (6) If the Administrator does not approve the ACD, the Policy Division works with the OPI to determine the path forward to address the Administrator's concerns.

c. Publish.

- (1) Policy Division posts the ACD on the NNSA directives website. (Appendix K)
- (2) OPI and NNSA's Authorization Coordinators, AOs, and AO Delegates are notified through email that the ACD has been published and is available on the directives website. (Appendix K)

d. Conversion to Formal NNSA Directive. See Appendix C.



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APPENDIX F: CERTIFICATION OF NNSA DIRECTIVES

1. **BACKGROUND.** This appendix describes the process for verifying continuing relevance of existing National Nuclear Security Administration (NNSA) directives (certification) and determining if revision or cancellation is necessary.

The certification process described below applies to Supplemental Directives (SDs), NNSA Policies (NAPs), and Business Operating Procedures (BOPs).

2. **REQUIREMENTS.** NNSA directives must be reviewed every 3 years by the Office of Primary Interest (OPI) as determined by date of approval.

3. **PROCESS.**

- a. The Policy Division, Business Services, Management and Budget (Policy Division) distributes a checklist annually to each OPI's Authorization Coordinator, Authorizing Official (AO), and AO Delegate that lists the directives due to be reviewed.
- b. The OPI completes the checklist and returns it to the [NNSA Directives Mailbox](#).
- c. The Policy Division consults with the OPI after the OPI decides the directive is still relevant to determine if any proposed revisions are administrative or substantive in nature.
 - (1) The process described in Appendix D (Administrative Changes) must be followed for administrative changes.
 - (2) The process steps in Appendix B, Section 3.a. (Development of the Review and Comment Draft) through Section 3.f.. (Publish) must be followed for substantive changes.
 - (3) The process steps in Appendix G, Section 3. (Cancellation of NNSA Directives) must be followed when the OPI's AO recommends a directive is no longer relevant or when the OPI fails to take action to certify, cancel, or revise the directive.

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APPENDIX G: CANCELLATION OF NNSA DIRECTIVES

1. **BACKGROUND.** This appendix describes the process for cancelling National Nuclear Security Administration (NNSA) Policies (NAPs), Supplemental Directives (SDs), and Business Operating Procedures (BOPs).
2. **REQUIREMENTS.**
 - a. The cancellation process must be followed when a directive is no longer needed or when the Office of Primary Interest (OPI) has not taken action to certify, cancel, or revise the directive.
 - b. NNSA directives must be reviewed every 3 years by the OPI.
 - c. The Policy Division, Business Services, Management and Budget (Policy Division), must initiate the cancellation process when the OPI has not taken action to certify, cancel, or revise the directive after certification was due.
 - (1) Directives scheduled to expire must undergo a concurrence review (only major comments will be accepted).
 - (2) The current directive must remain in effect until the results of the concurrence review are resolved.
3. **PROCESS.**
 - a. OPI:
 - (1) Consults with the Policy Division after the need to cancel a directive is identified.
 - (2) Provides the following information on the cancellation memo template for distribution with the directive (Appendix K):
 - (a) Original intent of the directive and its revision history.
 - (b) Justification for cancelling the directive and, if applicable, why it is not being replaced and why the requirements are no longer needed.
 - (c) The cancellation's effect on the NNSA nuclear security enterprise and any cost savings, if applicable.
 - (d) Concurrence from the OPI's Authorizing Official (AO) that the directive should be cancelled.
 - b. The process steps in Appendix B, Sections 3.b. (Review and Comment) and 3.c. (Comment Resolution) are followed with the exception that the directive is

posted in RevCom for a concurrence review and only major comments will be accepted.

- c. OPI documents the results of the concurrence review in the draft cancellation memorandum prepared in Step 3.a.(2) above. After the OPI and the Policy Division's technical editor agree the draft cancellation memorandum is ready for signature, the OPI sends a Microsoft Word file of the memorandum to the [NNSA Directives Mailbox](#).
- d. Policy Division obtains approval of the cancellation memorandum:
 - (1) The process in Appendix B, Section 3.e.(2) (Signature) is followed for NAPs and SDs.
 - (2) The signature of the responsible AO is obtained for BOPs.
- e. The Policy Division posts the cancelled directive and the memo approving the cancellation in the archives section of the directives portal and notifies Authorization Coordinators, AOs, and AO Delegates that the directive is no longer in effect.

APPENDIX H: DEVELOPMENT OR REVISION OF DOE DIRECTIVES

(RESERVED)

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APPENDIX I: ACRONYMS

a.	<u>AC</u>	Authorization Coordinator
b.	<u>ACD</u>	Advance Change Directive
c.	<u>AO</u>	Authorizing Official
d.	<u>BOP</u>	Business Operating Procedure
e.	<u>CFR</u>	Code of Federal Regulations
f.	<u>CRD</u>	Contractor Requirements Document
g.	<u>CTA</u>	Central Technical Authority
h.	<u>DOE</u>	Department of Energy
i.	<u>DOE O</u>	Department of Energy Order
j.	<u>DNFSB</u>	Defense Nuclear Facilities Safety Board
k.	<u>DRB</u>	Directives Review Board
l.	<u>IA</u>	Interagency Agreement
m.	<u>MOU</u>	Memorandum of Understanding
n.	<u>NAP</u>	NNSA Policy
o.	<u>NNSA</u>	National Nuclear Security Administration
p.	<u>OPI</u>	Office of Primary Interest
q.	<u>RevCom</u>	Automated Review & Comment Tool
r.	<u>SAC</u>	Senior Authorization Coordinator
s.	<u>SAO</u>	Senior Authorizing Official
t.	<u>SD</u>	Supplemental Directive
u.	<u>SME</u>	Subject Matter Expert
v.	<u>SOP</u>	Standard Operating Procedure
w.	<u>U.S.C.</u>	United States Code

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APPENDIX J: DEFINITIONS

- a. Administrative Changes. Edits that add minimal content and do not alter requirements or responsibilities in the affected directive, as determined by the Deputy Associate Administrator for Management. Examples are (a) typographical errors; (b) changes to organization names or titles of officials; (c) clarifications of intent in response to feedback received; or (d) changes in law or legal citations.
- b. Advance Change Directive. Temporary directive the Administrator uses to issue immediate direction to more than one NNSA organization.
- c. Authorization Coordinator (AC). An NNSA organization's staff member who provides administrative support to Authorizing Officials (AOs) and AO Delegates. Duties include assigning subject matter experts to review directives, collecting and consolidating comments, entering the organization's official comments into RevCom, and serving as the organization's liaison to the Policy Division, Business Services, Management and Budget, on directives issues. Appointed by memorandum by the Authorizing Official; acknowledges responsibilities in writing.
- d. Authorizing Official (AO). The senior executive in an NNSA federal or contractor organization.
- e. Authorizing Official (AO) Delegate. Senior-level direct report (Chief of Staff, Executive Director, Executive Officer) chosen by the AO to execute the AO's delegable responsibilities.
- f. Business Operating Procedure (BOP). Establishes business procedures not covered in a Supplemental Directive or NNSA Policy. (Appendix A, Types of NNSA Directives.)
- g. Certification. Process for reviewing directives that have been in effect for 3 years for accuracy and continued relevance. (Appendix F, Certification of NNSA Directives.)
- h. Central Technical Authority (CTA). Executes responsibilities related to the directives process as established in DOE O 410.1, *Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*, and SD 410.1A, *NNSA CTA Responsibilities Regarding Nuclear Safety Requirements*.
- i. Comment Resolution, NNSA. Process in which the OPI responds to comments received during the review of draft directives. Major comments not resolved go through the impasse process described in Appendix B, Development or Revision of NNSA Directives.
- j. Concurrence Review. A directive is issued to NNSA organizations for a second review post Appendix B's comment resolution stage when the directive's requirements or responsibilities were changed or if comment resolution took several months (as determined by the Policy Division on a case-by-case basis). Only major comments are

accepted. Major comments that were resolved during the initial comment resolution cannot be re-negotiated.

- k. Contractor Requirements Document (CRD). An attachment to a directive that states the parts of the directive that apply to contractors. When required, a CRD is included as Attachment 1 to a directive.
- l. Coordination. Process by which all affected or interested NNSA federal organizations review and comment on draft directives and all affected NNSA Management and Operating contractors comment on Contractor Requirements Documents. (NNSA federal organizations have discretion to ask contractor subject matter experts to review entire directives. Contractor-originated comments that are accepted by AOs must be sent in and defended by the federal organization.)
- m. Departmental Elements. DOE Headquarters elements and first-tier organizations.
- n. Directives, DOE. Official communications of policies, requirements, and procedures used to inform, direct, and guide employees in the performance of their duties, and to enable employees to work effectively within the Department and with other Government agencies, contractors, and the public. DOE directives include Policies, Orders, Notices, Manuals, and Guides.
- o. Directives, NNSA. Documents used to establish, communicate, and institutionalize policies, requirements, responsibilities and procedures specific to NNSA federal organizations and contractors. NNSA directives consist of Supplemental Directives (SDs), Policies (NAPs), Advance Change Directives (ACDs), Business Operating Procedures (BOPs), and Standard Operating Procedures (SOPs). SDs, NAPs, ACDs, and BOPs are mandatory, carry equal weight, and affect more than one NNSA organization.
- p. Directives, NNSA-owned. DOE Directives for which NNSA is the Office of Primary Interest.
- q. Directives Review Board (DRB). Established by DOE O 251.1D, and chaired by the Director of DOE's Office of Management, the Board advises and concurs on DOE directives before their release DOE-wide for comment and final issuance. Board membership is comprised of senior representatives from each of the three Under Secretarial Offices, the Office of General Counsel, and the Office of Environment, Health, Safety and Security. Advisory members include senior representatives from the National Laboratory Directors Council and the Field Management Council.
- r. Editorial Comment. Term used in DOE Order 251.1D, *Departmental Directives Program*, to refer to suggested comments.
- s. Equivalencies. Alternatives to meeting a requirement in a DOE or NNSA directive. Equivalencies represent an alternative approach to achieving the goal of the directive.

Unless otherwise defined in a specific NNSA directive, equivalencies are granted by the Administrator.

- t. Exemptions. The release from one or more requirements in a DOE or NNSA directive. Unless otherwise defined in a specific NNSA directive, exemptions are granted by the Administrator.
- u. Functional Organization. NNSA Headquarters organization who has responsibility for the subject area covered by a DOE directive when NNSA is not the OPI for the directive. Alternatively, a DOE Headquarters organization who has Departmental responsibility for a subject area covered by an NNSA NAP or SD.
- v. Guides. Provide acceptable, but not mandatory, means for complying with requirements included in Orders and Manuals that have not yet been phased out. Guides must be associated with a directive or a rule. Guides do not impose requirements, but may quote requirements if the sources are adequately cited.
- w. Impasse. When a resolution of major comments or other directives-related issues cannot be agreed on between NNSA organizations or between NNSA and DOE organizations and the issue is raised to the Principal Deputy Administrator or Deputy Secretary for decision.
- x. Interagency Agreement (IA). An interagency agreement is a document that defines cooperative work between government agencies and departments. The agreement defines the parties involved, the work performed, and the transfer of technologies and funds.
- y. Major Comment. Comments that identify serious consequences that may result from implementing the directive. Examples include concerns that raise health, safety, or environmental issues; preclude or hamper mission accomplishment; hinder compliance with applicable laws, rules, or regulations; hamper fulfilling contractual obligations or formal commitments; create costly inefficiencies with no corresponding benefit; or identify important missing or conflicting information that prevents successful implementation of the directive. (DOE uses *Substantive Comment* and *Significant Comment* instead of *Major Comment* to refer to the examples provided in this definition.)
- z. Manuals. Dictate how federal and contractor employees are to implement requirements. Manuals are being phased out and canceled or converted to or incorporated into directives, as appropriate. Manuals will not be revised and no new Manuals will be created.
- aa. Memorandum of Understanding (MOU). A nonbinding agreement between two or more parties outlining the terms and details of an understanding, including each parties' requirements and responsibilities. An MOU is often the first stage in the formation of a formal contract.

- bb. NNSA Organizations. Headquarters elements and sub-elements that report directly to the Administrator, and NNSA Management and Operating (M&O) contractors.
- cc. NNSA-owned Directive. A DOE Directive for which NNSA is the Office of Primary Interest.
- dd. NNSA Policy (NAP). Establishes policies, requirements, and responsibilities unique to NNSA that are traceable to parent requirements in laws, regulations, MOUs, or IAs with the exception of requirements established by the Administrator under the authorities of the *NNSA Act*. Focuses on a subject area not covered by a DOE directive or technical standard. (Appendix A, Types of NNSA Directives)
- ee. NNSA Stakeholder. For the purpose of the DOE Integrated Project Team process, NNSA stakeholders are defined as affected senior management and SMEs in all NNSA organizations as well as other offices reporting directly to the Administrator.
- ff. Nuclear Security Enterprise. Collective term for NNSA's Headquarters program and mission support offices, field offices, laboratories (Sandia, Los Alamos, and Lawrence Livermore National Laboratories), production plants (NNSA Production Office, Kansas City National Security Campus, Savannah River Site), and the Nevada National Security Site.
- gg. Office of Primary Interest (OPI). The office responsible for originating and writing a directive and maintaining its accuracy and currency.
- hh. Revision. Edits to a directive that change requirements or responsibilities, or add a substantial amount of content.
- ii. Requirements. Actions that must be completed or processes that must be followed in order to achieve a directive's purpose.
- jj. Responsibilities. Duties and authorities assigned to a position or office to implement, manage, or oversee directives.
- kk. Senior Authorizing Coordinator, NNSA. Director, Policy Division, Business Services, Management and Budget. Establishes and manages processes for developing NNSA's official position on DOE directives. Provides administrative and analytical support to NNSA's Directives Review Board members and NNSA's Senior Authorizing Official.
- ll. Senior Authorizing Official, NNSA. Determines NNSA's official policy position on DOE directives.
- mm. Signature Package for NNSA Directives. The approval memo, a clean copy of the final draft directive, the comment resolution report, a concurrence page, and background documentation relevant to the directive.
- nn. Significant or Substantive Comment. Terms used in DOE SD 251.1D, *Departmental Directives Program*, to refer to major comments.

- oo. Suggested Comment. Comments that are editorial or grammatical in nature or identify issues that will not produce serious consequences from implementing the directive. (DOE uses *Editorial Comment* instead of *Suggested Comment* to refer to the examples provided in this definition.)
- pp. Sunset Date. Date assigned by the Policy Division, Business Services, Management and Budget, to a directive which is 3 calendar years from the date the directive was last certified by the directive's Office of Primary Interest.
- qq. Supplemental Directive (SD). Augments policies, requirements, and responsibilities covered in a DOE directive or technical standard. (Appendix A, Types of NNSA Directives)
- rr. Unauthorized Directives. Term used in DOE Order 251.1D, *Departmental Directives Program*, to refer to unofficial directives.
- ss. Unofficial Directives. Unofficial directives are documents that apply recurring or long-term requirements to NNSA federal or contractor organizations that have not been reviewed and issued through the DOE or NNSA formal directives processes (e.g., emails and memos, etc.). Unofficial directives do not include communications from Contracting Officers and Contracting Officer's Representatives to contractors or to communications from DOE or NNSA attorneys.

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APPENDIX K: REFERENCES

- a. 50 U.S.C. 2401 et seq., *National Nuclear Security Administration Act*.
- b. Title 41, Code of Federal Regulations (CFR), 102-193, *Creation, Maintenance, and Use of Records*.
- c. DOE O 251.1D, *Departmental Directives Program*, dated 1-17-17.
- d. DOE, *Crosswalk of Directives Numbering System*,
<https://www.directives.doe.gov/development-and-review-of-directives/crosswalk-directive-numbering-system>
- e. NNSA SD 410.1A, *Implementation of National Nuclear Security Administration Central Technical Authority Responsibilities Regarding Nuclear Safety Requirements*, dated 6-2-11.
- f. NNSA SD 450.2 Admin Change 1, *Functions, Responsibilities, and Authorities (FRA) Document for Safety Management*, dated 1-27-15.
- g. NNSA SD 243.1 Admin Change 1, *Records Management Program*, dated 3-21-16
- h. U.S. Government Publishing Office, [*Style Manual*](#), 2016
- i. U.S. Department of Energy Executive Secretariat [Style Guidelines](#).
- j. [Federal Plain Language Guidelines](#), March 2011.
- k. NNSA Directives Website: <https://directives.nnsa.doe.gov>

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APPENDIX L: SAMPLE TRANSMITTAL MEMO TO ADMINISTRATOR

MEMORANDUM FOR THE ADMINISTRATOR

FROM: [NAME]
ASSOCIATE ADMINISTRATOR FOR MANAGEMENT AND BUDGET

[NAME]
[TITLE] (Head, Office of Primary Interest)

SUBJECT: ACTION: NNSA Supplemental Directive (SD) 205.1, *Baseline Cybersecurity Program*

ISSUE: (Brief statement on what we are doing) Approve the Cybersecurity SD.

BACKGROUND: (One paragraph – brief history of subject)

The August 2016 revision of Department of Energy (DOE) Order 430.1C, *Real Property Asset Management*, requires Under Secretaries to develop real property management processes and issue supplemental directives as necessary to implement them.

DISCUSSION: (Why we are doing what we are doing, external drivers, etc.)

This SD replaces Business Operating Procedure (BOP)-40.001C. Since this policy implements Department of Energy (DOE) Order 150.1, *Continuity Programs*, it is more appropriate as an SD than a BOP.

This policy was circulated to NNSA's elements/Headquarters NNSA elements for review, 282 comments were received, of which 72 were major. All comments were resolved.

- Summary of major comment themes:
 - Bullet points of themes

RECOMMENDATION: Sign the attached SD.

Attachment: SD 205.1, *Baseline Cybersecurity Program*

Summary of Major Comment Themes

[illegible]