

- Q1. Since the new values are less restrictive, are the current RPPs compliant?
- A. Yes, the current RPPs would be compliant.
- Q2. Would the RPP changes to accommodate the revised Appendix C decrease the effectiveness of the RPP and, therefore, require DOE approval?
- A. Incorporating these changes into existing RPPs would not decrease the effectiveness, and DOE approval prior to implementing changes is not required.
- Q3. Does the contractor have to submit an updated RPP to DOE within 180 days of the effective date of the amendment, per 10 C.F.R. 835.101(g) (3)?
- A. Per 10 C.F.R. 835.101(g) (3), an updated RPP must be submitted within 180 days of the effective date of the amendment. The update can be a statement that the RPP is compliant with the April 13, 2011, amendment.
- Q4. Could the new RPP have an implementation plan that extends any length of time since the current RPP is compliant?
- A. There is no time limit on the implementation plan assuming the existing RPP was already compliant.
- Q5. Could the contractor propose in the submitted RPP to retain the previous Appendix C values since they are more restrictive? Would this plan of action require an implementation plan?
- A. The updated RPP may just state that no changes are planned.
- Q6. If DOE does not reject an updated RPP within 180 days after its submission, can the contractor assume approval?
- A. Yes, per 10 C.F.R. 835.101(i).