Westinghouse
Savannah River Company
Aiken, SC 29808

SRS savannah river site

January 12, 2004

WSR-2004-00032
RSM Track #: 10667

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NUCLEAR INFORMATION
ADC & Reviewing Official (Name and title)
Date: 1/13/04

Mr. John T. Conway, Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave. N.W.
Suite 700
Washington, DC 20004

RECEIVED
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DNFSB

Dear Mr. Conway:

REQUIREMENT CHANGES AT SAVANNAH RIVER SITE (SRS)

Ref: DNFSB Public Meeting held in Washington, D.C., Thursday, December 4, 2003

At our public meeting in Washington, D.C., December 4, 2003, you requested examples of changes we made at SRS to improve our productivity and reduce costs. In the past two years, Westinghouse Savannah River Company (WSRC) pursued numerous changes to safely accelerate the risk reduction and closure of the legacy EM facilities changes. We made changes in organization to focus on projects; changes in environmental regulatory approach to optimize environmental cost benefit; and changes in site processes to improve efficiency in facility projects. Process efficiency changes focused on changes to WSRC site level procedures without impacting S/RID or other contract requirements. Most of the efficiency changes made in the last year accentuated long-standing tailoring options previously underutilized by WRSC projects.

Any changes in safety related or defense-in-depth controls were made only after associated hazards were eliminated or we worked through the disciplined change control process that is a part of our Integrated Safety Management System (ISMS). In the latter case, we used ISM approaches to carefully tailor controls to the specific hazards of our work. The attached report summarizes changes WSRC made in the past few years. This information is also being provided to your staff currently exploring similar questions on site. However, I wanted to personally respond to your questions from our earlier conversation.

If you have additional questions regarding the ISM of site requirements and the change control process we use, please contact George Clare (803) 952-7222 who presently chairs our Site Policy and Procedure Council. If you have further questions regarding the ISM implementation of changes in the facilities, please contact Leo Sain (803) 952-4275.

Sincerely,

Robert A. Pedde, President

RAP:SKM:nb
Att

LETTER, R. A. PEDDE TO J. T. CONWAY, "REQUIREMENT CHANGES AT SAVANNAH RIVER SITE (SRS)," DATED JANUARY 8, 2004

c: A. J. Eggenberger, DNFSB, Washington
J. E. Mansfield, DNFSB, Washington
R. B. Matthews, DNFSB, Washington
J. M. Allison, DOE-SR, 730-B
A. B. Posten, DOE-SR, 730-B
T. T. Davis, DNFSB-SR
T. D. Burns, DNFB-SR
W. J. Johnson, WSRC, 730-1B
S. K. Formby, WSRC, 730-1B
G. Clare, WSRC, 730-4B
L. Sain, WSRC, 703-F
J. Hay, WSRC, 730-1B

Westinghouse
Savannah River Company
Aiken, SC 29808

SRS
savannah river site

DEC 29 2003

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ADC & Reviewing Official: [illegible]
Date: 4/7/04

WSR-2003-00227
RSM Track #: 10667

Mr. Jeffery M. Allison, Manager
Savannah River Operations Office
P.O. Box A
Aiken, SC 29802

Dear Mr. Allison:

TAILORING REQUIRMENTS TO ENABLE ACCELERATED CLEANUP SUCCESS

RE: Tailoring Requirements to Enable Accelerated Cleanup Success, September 18, 2003

In response to your letter of September 18, 2003, I am providing the attached summary of advances we have made related to application of tailoring and the results of recent requirements reviews to determine if there are opportunities for savings that can be channeled to closure work at SRS. It provides many examples of where WSRC has and continues to successfully apply tailoring approaches to find cost savings, productivity improvements, and cost avoidances that enable acceleration of our environmental clean-up work priorities, while complying with the Contractor Requirements Documents (CRDs), and maintaining a strong safety and security posture.

WSRC evaluates opportunities for tailoring of existing requirements/Directives through routine and focused requirements reviews. We performed a focused review on fourteen Directives (thirteen identified in your letter and another identified in a special DOE-SR report) for tailoring opportunities, and have identified six as having additional savings potential. We plan to pursue four of the six for immediate change approval by DOE-SR and DOE-HQ (as applicable). The responsible WSRC functional managers will be putting together justification requests for tailoring, in accordance with the guidance you provided in your letter of September 18, 2003, *Exemption and Change Proposals to Requirements*. They will be working with their counterparts to garner DOE-SR and DOE-HQ support. Two Directives related to DWPF and glass acceptance have potential for savings not only at SRS, but also at Hanford and Idaho. However, the required change poses significant challenges that require further dialog between WSRC and DOE-SR regarding the benefit and probability of change.

WSRC also evaluated the current S/RID requirements to determine if there were Directives referenced therein that have been cancelled or archived. We identified fifteen superseded, cancelled, or replaced Directives containing requirements cited in the S/RID. Eleven of the Directives are cancelled DOE-SR Directives Implementation Instructions (DII's) that are the subject of discussion with your staff on the approach for individual S/RID revisions. Three of the Directives have been superseded and one Directive has been replaced, but is still in the S/RID based on agreement between WSRC and DOE-SR functional experts. We did not identify any instances where the S/RID contained cancelled or superseded Directives that were not known and being dispositioned through the S/RID Program.

DEC 29 2003

WSRC is committed to leveraging tailoring approaches, including requirements tailoring, to find savings opportunities that will allow us to enhance the closure and clean-up work at SRS. We are also committed to doing this within the Integrated Safety Management System (ISMS). We have developed a set of guidelines to be used as a management tool in an effort to continue to leverage requirements tailoring. We look forward to submission of our requirements tailoring requests and your subsequent approval in the near future.

If you have any questions regarding this response or the attached report please do not hesitate to contact Ms. Laurie Hollick at 803/952-7946 or Ms. Kathy Hatcher on 803/725-0214.

Sincerely,

R.A. Pedde, President

KAH:tb
Att

Additional Reference 2: Exemption and Change Proposals to Requirements, September 18, 2003

c: C. E. Anderson, DOE-SR, 730-B
W. F. Wright, 730-B
W. J. Johnson, WSRC, 730-1B
H. T. Conner, 730-1B
J. C. DeVine, 703-H
W. S. Elkins, 730-1B
L. J. Hollick, 730-1B
K. A. Hatcher, 742-1A
J. G. Meyer, 703-45A
A. F. Kaminsky, 730-1B
J. W. Reece, 766-H
J. B. Hay, WSRC File Copy, 730-1B
Records Admin, 703-43A

WSRC Tailoring Response

Letters from Mr. Allison to Mr. Pedde

(September 18, 2003)

Tailoring Requirements to Enable Accelerated Cleanup Success

Exemption and Change Proposal to Requirements

December 17, 2003

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I. EXECUTIVE SUMMARY

Westinghouse Savannah River Company (WSRC) is committed to safe, secure and cost effective operations at the Savannah River Site (SRS). We agree with and promote the utilization of tailoring, including requirements tailoring, to support accelerated clean-up, within the framework of our Integrated Safety Management System (ISMS), and while complying with the Contractor Requirements Documents (CRDs) and maintaining the high standard of safety and security for which Savannah River Site (SRS) is renowned.

Over the years we have worked to improve cost-effectiveness though many different cost savings and productivity improvement programs that capitalize on tailoring approaches. These include, but are not limited to, safe mission essential (SME) initiatives, the cost reduction implementation team (CRIT), the productivity and cost effectiveness (PACE) program, and routine and focused requirements reviews. These programs and the associated savings were achieved simultaneous with implementation verification/validation of our Integrated Safety Management System (ISMS) and achievement of Voluntary Protection Program (VPP) Star status, both of which are currently undergoing reverification and recertification respectively.

WSRC utilizes a combination of routine and focused reviews that have enabled us to implement cost-effective tailoring of Department of Energy (DOE) requirements and our implementing procedures. Requirements tailoring includes a formal request for change (e.g., deviation, waiver, exemption, exception, equivalency, etc.) or the change in the interpretation of a Directive or requirement. The latest routine review of the Standards/Requirements Identification Document (S/RID) was completed earlier this year. Non-Environmental, Safety and Health (non-ES&H) requirement reviews are typically done through focused reviews and whenever the Directive is revised.

In your letter dated September 18, 2003, thirteen specific Directives were identified as having potential for yielding additional cost benefits that could help accomplish accelerated clean-up work if the Directive were tailored. An additional Directive was identified after review of the March 2003, Special Integrated Project Team Report on Regulations, Orders and Requirements (referred to as Directives for remainder of this document). Of the fourteen Directives outlined in the September 18, 2003 letter and Special Integrated Project Team (SIPT) report, eight have already had requirements changes in the past, are currently in the process of having changes approved, or have no currently identified need for requirements changes. Six Directives have been identified as having further tailoring potential and four of the six will be pursued with DOE for tailoring in the near future. These include training and Safeguards and Security Orders. The two related to DWPF glass acceptance reflect difficult challenges, since the change would affect the licensing application for the Yucca Mountain Site, but would benefit other sites beyond SRS (e.g. Hanford and Idaho) if the glass quality requirements were eliminated from the application and lower tier requirements documents. Each of the affected functional managers will be putting together justification requests for tailoring and working with their counterparts to garner DOE-SR and/or DOE-HQ support (as applicable) in accordance with your letter, *Exemption and Change Proposal to Requirements*, dated September 18, 2003.

WSRC also evaluated the current S/RID requirements to determine if there were Directives referenced therein that have been cancelled or superseded. There are currently fifteen superseded, cancelled, or replaced Directives containing requirements cited in the S/RID. Eleven of the Directives are cancelled DOE-SR Directives Implementation Instructions (DII's) that are the subject of discussion with your staff on the approach for individual S/RID revisions. Three of the Directives have been superseded and one Directive has been replaced, but is still in the S/RID based on agreement between WSRC and DOE-SR functional experts. We did not identify any instances where the S/RID contained cancelled or superseded Directives that were not known and being dispositioned through the S/RID Program.

We have used and continue to use multiple tailoring approaches to enhance the progress of environmental clean-up and closure. Included in this response, you will find many examples of our recent tailoring successes, including requirements tailoring, and some of the financial benefits (e.g., completion of an additional $129M of environmental management (EM) scope in FY02 and $67M in FY03) that have resulted from these efforts. In addition, we have targeted over $70M in potential future savings through our Six Sigma program. These savings translate into an ability to channel resources to perform additional field clean-up work. WSRC will be pursuing the request for approval for changing four directives or their current interpretation in the near future and is looking forward to your approval as we again work toward supporting the site's accelerated clean-up vision in a safe, secure and cost-effective manner. It is imperative that all actions taken to become more effective and/or efficient be taken only if we can maintain the integrity of our ISMS program. This has and continues to be the foundation for our cost reduction focus and tailoring efforts, including this requirements tailoring response.

II. BACKGROUND

Although fiscal stewardship and cost reductions have been a common focus for many years at SRS, the onset of an accelerated clean-up vision and increased focus on risk reduction, work acceleration, and end states increased the priority for cost savings and productivity improvements that would allow WSRC to channel additional resources to accelerating clean-up of SRS. This vision and its associated focus were the genesis of the safe mission essential (SME) philosophy in FY02. SME was started as part of Disciplined Conduct of Projects (DCOP) and was aimed at assuring we are not over-specifying or "gold plating" projects. The Project & Procedures Team was tasked last October to implement as many changes as possible in order to safely accelerate work within six months. By necessity of time, the team focused on identifying over conservatism in site level requirements beyond the S/RID requirements that were totally within WSRC's authority to change. The team went directly to the users of the requirements to identify the biggest impediments and focused on these for three months. The next three months were spent trying to communicate to the new project teams how to safely change their processes using ISM to tailor work activities to more appropriately address the specific hazards associated with their tasks. None of the original SME effort focused on changes to the DOE or other Directives, or S/RID requirements due to the compressed and limited schedule. ISMS and the successful experiences of the commercial nuclear world, as measured by Institute of Nuclear Power Operators (INPO), were the models for the SME changes. SME terminology has since been eliminated in an effort to prevent confusion and more clearly define our expectation that any tailoring must occur within the context of our Integrated Safety Management System (ISMS) program and philosophy. We do not want any confusion that these tailored approaches or increased flexibility in any way supports lessening our safety or security postures.

The term "tailoring" is used as a general term for the approaches we have applied over the years to find cost savings, productivity improvements, or cost avoidances. Tailoring includes such activities as process streamlining, reengineering, Six Sigma process reviews, applying a graded approach, using a technology solution, applying an alternate skill set [e.g. multi-skill technicians (MSTs), flexible skill assignments (FSAs), outsourcing, or subcontractors], and requirements tailoring. "Requirements tailoring" is just one type of tailoring and includes formal requirements changes such as deviations, exemptions, exceptions, waivers, and equivalencies or changes in the interpretation of DOE Directives or requirements.

Our purpose in tailoring is to apply the right "fit" for the specific work function in the ISMS model (i.e., identifying opportunities within the work management functions of planning work, analyzing hazards, establishing controls, performing work, assessing work and providing feedback), as well as the right "fit" for the Directives that drive our work processes. The end result is the reduction in the cost of work performance while preserving the integrity of our ISMS.

III. TAILORING

A. Application

As previously noted, we have been applying tailoring approaches for many years. The following high-level summary illustrates our cost effectiveness focus and how it significantly increased with SME and the accelerated clean-up focus in FY02. It also represents the change in contracting strategy from a funds-based management approach to a performance-based management approach

	FY01	FY02	FY03
Cost Savings	$34.3M	$127M	Not Documented
Productivity Improvement	$4.6M	Not Documented	Not Documented
Cost Avoidance	$16.9M	Not Documented	Not Documented
Additional EM Scope Completed	Not Documented	$129M	$67M

It is important to note that in FY02 WSRC really started the focus for savings to accelerate clean-up and in FY03, along with the contract changes, came a de-emphasis on the documentation of cost savings, cost avoidances, and productivity improvements, and an emphasis on additional work scope completion. Some examples of additional scope completed in FY03 include increased canister production and loading weight factors, accelerated disposition of existing plutonium residue in H B-Line, accelerated disposition of enriched uranium solution, accelerated removal of spent solvent from F Area, completed de-inventory of the Receiving Basin for Offsite Fuels (RBOF), and accelerated TRU waste shipments to the Waste Isolation Pilot Plant (WIPP) to name a few.

Attachment 1, Advances in Cost Effectiveness through Tailoring, is provided to illustrate some representative examples of the advances we have made in cost-effectiveness through the application of various tailoring approaches, again including requirements tailoring. This is not intended to be an all inclusive list; rather, some of our higher profile functional and line areas. These savings translate into our ability to accomplish priority and accelerated clean-up scope.

B. Requirements Tailoring

WSRC actively evaluates ES&H and non-ES&H requirements for potential tailoring opportunities in relation to SRS missions. Over the years, we have utilized a combination of routine and focused reviews that have enabled WSRC to implement cost-effective tailoring of DOE requirements and our implementing procedures.

Routine activities include our initial review and comment on draft Directives and draft Directive revisions through the review and comment (REVCOM) process. We also perform an applicability review of new/revised Directives issued to us through the Contract Administrator Notice (CAN) process. The reviews through the REVCOM and the CAN processes often provide opportunities for initial tailoring that permit cost-effective implementation of particular requirements. Recent efforts on DOE O 430.1B, *Real Property Asset Management,* provide an excellent example of tailoring new requirements through our review processes. There are three requirements to which we have applied a tailored approach. They include maintenance cost reporting, detailed engineering facility/equipment condition and annual deferred maintenance estimates, and Facility Information Management System (FIMS) reporting. These three examples, for this one Order, represent cost avoidance estimates of greater than $5M annually.

We also conduct periodic routine (biennial) reviews of the S/RID to ensure that it still contains an appropriate set of ES&H requirements. The last review was completed earlier this year (2003). Part of this review asks our S/RID Functional Area Managers (FAMs) and Subject Matter Experts (SMEs) to consider revisions to S/RID requirements or their applicability based on a variety of possible drivers, including mission changes,

changes in hazards, operating experience, cost-savings initiatives, etc. Review for potential tailoring is part of this routine requirements review.

Non-ESH requirements are those DOE Directives (Orders, Manuals, Policies) that are issued to WSRC through the CAN process and which, after review by WSRC, are determined to contain requirements applicable to WSRC and are contractually funded. A Compliance Assessment and Implementation Report (CAIR) is developed for each Directive to demonstrate the exact requirements applicable and the linkage to WSRC procedures that provide for compliance. The data is maintained current through the S/RID web-page on ShRINE. Non-ESH requirements are typically evaluated along with Order changes or during focused reviews.

Many of the WSRC tailoring opportunities that have been pursued in the past also come from our focused reviews that have been established with cost-effectiveness as their central theme. Our current Individuals Developing Effective Alternative Solutions (IDEAS) program is another avenue for initiating a requirements review. Other recent past initiatives came from similarly focused reviews, including PACE and CRIT. Over the years these types of initiative programs have produced good results associated with many site functions and requirements. A very visible, recent example was our partnering with DOE-SR to request DOE-HQ approval of alternate radiological release criteria for SRS. Although this initiative took several years to come to fruition, it is estimated to save over $8M per year.

Another type of focused review is through participation with the Energy Facility Contractors Group (EFCOG). EFCOG is an especially viable forum when the desired initiative is broader than SRS. A recent example is the re-design of the Occurrence Reporting process that was initially identified in the first DOE Executive Safety Summit and then developed and issued by a joint DOE-HQ and EFCOG team, spearheaded by WSRC.

In your letter dated September 18, 2003, thirteen specific Directives were identified as having potential for yielding additional benefits to support accelerated clean-up work if the Directive were tailored. We also reviewed a copy of the report *Critical Decision-4 Special Integrated Project Team (SIPT) Report on Regulations, Orders and Requirements, dated March 26, 2003* that precipitated the letter. In review of the report, we found another Directive in the tables that was identified as an area of opportunity and have added it to our review and this response.

The thirteen Directives specifically identified, include:

- Maintenance Management - DOE O 433.1
- Environmental Protection - DOE O 450.1
- ES&H Protection Standards - DOE O 5480.4
- Packaging and Transportation Safety - DOE O 460.1A (now 460.1B)
- Departmental Materials Transportation of Material of National Security Interest - DOE 460.2
- Personnel Selection, Qualification and Training - DOE O 5480.20A
- Identification and Protection of Unclassified Controlled Nuclear Information - DOE O 471.1A
- Control and Accountability of Nuclear Materials - DOE O 474.1A
- Safeguards and Security Program - DOE O 470.1, Chg. 1
- Federal Facility Agreement – ADN-89-05-FF
- Program and Project Management for the Acquisition of Capital Assets - DOE O 413.3
- Glass Waste Acceptance Product Specifications – EM WAPS
- Waste Glass Quality Assurance Requirements – DOE-RW-0333P

Additional Directive from the matrix in the SIPT report:

- Packaging and Transfer (Defense Materials) - DOE O 461.1

Attachment 2, Requirements Tailoring, summarizes the results of a review of the need to tailor these fourteen Directives. For those identified as having no current request, it is not intended to infer that we will never want to exercise a tailoring of the requirement, it simply means that based on the review by the responsible functional manager, coordination with their DOE counterparts, and input from the line customers, there are no changes to the Directive requested at this time.

Of the fourteen Directives reviewed at this time and as outlined in the SIPT report and September 18, 2003 letter, eight have had, are currently in the process of being approved for some form of formal change, or there is no current request for change. Six (as outlined in Attachment 2) are identified as having further tailoring potential. Four of these six Directives (one for training and three for safeguards and security) will be pursued with DOE for tailoring in the near future. It is important to note that some of the requested changes (as identified in Attachment 2) only involve local interpretation changes and do not require formal change to the Directive. The two glass acceptance Directives will pose significant challenges in influencing the necessary change and are of lower priority; therefore there will not be an immediate request for change. Each of the affected functional managers will be putting together well justified requests for tailoring and working with their counterparts to garner DOE-SR and or DOE-HQ support and approval as directed in your letter of September 18, 2003, *Exemption and Change Proposals to Requirements.*

In addition to the 14 specific Directive reviewed, WSRC also evaluated the current S/RID requirements to determine if we were current on cancelled or superseded directives. The focus of this review was to determine if there were Directives that have been cancelled or superseded and whether we had a current disposition path. There are currently fifteen superseded, cancelled, or replaced Directives containing requirements cited in the S/RID. Attachment 3, Cancelled/Superseded Directives, outlines each of the fifteen and their current status. Eleven of the Directives are cancelled DOE-SR DII's that are the subject of discussion with your staff on the approach for individual S/RID revision. Three of the Directives have been superseded, with one currently undergoing an applicability assessment, one having only administrative differences that will be updated when the respective S/RID functional areas are next revised, and one which is applicable, but not recommended for inclusion in the S/RID. Finally, one Directive has been replaced, but is still in the S/RID based on agreement between WSRC and DOE-SR functional experts. We did not identify any instances where the S/RID contained cancelled Directives that were not known and being dispositioned through the S/RID Program.

IV. FUTURE REQUIRMENTS TAILORING

In preparing this response and determining if there is value in any further requirements tailoring, WSRC determined that some additional limited guidance and a general prioritization model could be helpful for determining whether a requirements tailoring opportunity would be safe, value-added, and worth pursuing. Attachment 4 outlines these guidelines and a simple prioritization model. This model was used by WSRC to evaluate those Directives listed in Attachment 2 where a change request is planned and the results are documented on Attachment 2. This model provides support for our position to pursue change of four Directives immediately, while doing further analysis and networking for the two lower priority tailoring opportunities (glass waste acceptance). This guidance is intended to be used by WSRC personnel in the future when evaluating the value of tailoring a requirement and for submission of well-justified requirements change requests. This guidance will be placed on the Site Procedure and Policy (SPP) Council website under "Policy and Procedure Support Information" with hot links to Management Policy 1.22, Integrated Safety Management System (Rev 5, 12/31/01). Additionally the 8B Manual, Compliance Assurance, will reference the availability of this "management tool". This will also be communicated through various communication modes in the near future. This, along with our routine and focused requirements reviews and the application of other various tailoring approaches (e.g., a targeted $70+M in potential future savings through the Six Sigma program) will be integral components of our ongoing efforts to continuously evaluate "requirements" and find tailoring opportunities that will support accelerated clean-up work.

Attachment 1
Advances in Cost Effectiveness through Tailoring

Functional or Line Area	Effective Date(FY)	Tailoring Activity and Derived Benefit (annual ongoing savings unless noted)
Sitewide	FY03	Implementation of the Six Sigma process with $11M in cost and $4M in productivity savings in FY03 alone. This includes reduction of the time/labor for the high level waste (HLW) handling process, reduction in the number of analytical tasks for the HLW corrosion control program, reduction in the cost of document control services, shortening field sampling mobilization time, reduction in the radiological support for routine well sampling, improvement in the records archival process and training records database quality, and reduction in the number of liquid effluent and environmental monitoring samples, to name a few.
Sitewide	FY03	Utilization of multi-skilled technicians (MSTs), flexible skill assignments (FSAs), high performance work teams, and subcontractors with specialty skills or lower labor rates as well as extended use of advanced radiological workers.
Sitewide	FY03	Implementation of the Automated Hazard Assessment (AHA) process with significant productivity savings.
Sitewide	FY03	Major revision to Conduct of Operations, maintenance, radiological control, and training procedures/manuals including incorporation of strong graded approach philosophies, barrier removal, delegation of authority to the lowest safe level, increased emphasis on Skill-of-the-Craft, and elimination of Use Every Time (UET) procedure restrictions as applicable.
Sitewide	FY02/FY03	Savings of $6.0M/year through the implementation of Requirements Based Surveillance and Maintenance (RBSM).
Environmental Protection	FY02/FY03/ FY04	Savings of $4.75M through two significant Six Sigma process reviews (liquid effluent and environmental monitoring), combination of sample activities, reduction in the size of the Annual Environmental Report and multiple other management challenges. An additional $1.3M for FY04 and beyond using various tailoring approaches including another Six Sigma process review.
Radiological Controls	FY02/FY04	Savings of $5.7M by reduction in the frequency of Radiological Control Inspector and First Line Manager oral boards, increase in the SRS radiation dose administrative control level (ACL) from 500 to 1000 mrem, elimination of facility/division ACLs stopping activities that were not required, reduction in the number of Standing Radiological Work Permits (RWPs), and reduction in the type and frequency of routine radiological habitability surveys to name a few. An additional $8.4M per year cost avoidance for alternate release criteria (a prime example of requirements tailoring) and $470K cost savings are also planned for FY04 and beyond.
Training	FY03	Savings of $3.6 M by reduction of the Training Program Infrastructure, utilization of web-based training [e.g. Radiological Worker Training (RWT), respiratory protection, Automated Hazard Assessment (AHA), etc.], streamlining processes, implementation of practical factors versus full On the Job (OJT) Training Guides; varied levels of training rigor based on hazard and complexity (graded approach), and combination of work with other training groups. This is in addition to two prior years of significant tailoring and cost savings.

Attachment 1 (cont.)
Advances in Cost Effectiveness through Tailoring

Functional or Line Area	Effective Date(FY)	Benefit Derived from Tailoring (annual ongoing savings unless noted)
Engineering	FY02	Cost savings of $4.6M by reduction in the requirements for Technical Baseline reconstruction deliverables and utilization of Asset and Information Management (AIM) system.
Information Technology	FY02/FY03	Additional cost savings of $325K by outsourcing added scope to the telephone, video network, data network and Help desk outsourced functions.
Transportation	FY02	Implementation of a risk-based approach for onsite transport capitalizing on DOT regulations resulting in a cost savings of $3M in program cost; changing from a complex, Type B container to Type A drums for onsite transport of tansuranic (TRU) waste resulting in $400K per year of savings that were diverted to higher priority activities; and reduction in the number and complexity of Onsite Safety Assessments (from 34 to 25) saving another $450K by tailoring the interpretation of the requirements in 461.1 and 460.1B.
Fire Protection	FY02/FY03	Reduction in fire system test time and security system maintenance to save $150K per year.
Safeguards and Security	FY02	Cost savings of $230K by elimination of activities that were not required.
	FY03	Approval and implementation of deviations for encryption of UCNI, Spent Fuel Program Material Balance Area (MBA) custodian, and Critical System Elements corrective maintenance (to name a few) resulting in significant productivity improvements and cost avoidance in excess of $3M.
High Level Waste	FY02/FY03	Elimination of sampling and analysis of the DWPF Melter Feed Tank yielded savings of $700K/year Elimination of redundant and unnecessary Independent Inspections resulted in the elimination of four QA shift and one day shift position. DOE acceptance of a disposal path for the glass that has accumulated on the Melt Cell floor via placing the glass in a canister and being filled with molten glass has decreased the risk for equipment failure and the associated cost and time delays impacting canister production. This also identified a path for disposal that was acceptable in lieu of designing alternate disposal containers, etc.
Soil and Groundwater Closure Project	FY02/FY03	Implementation of a Federal Facility Agreement (FFA) related "Core Team" approach, which cooperatively involves the regulatory agencies in real-time cleanup scoping and remediation planning to accelerate decision making, minimize rework, and optimize the application of low-cost remedies. This and other partnering strategies have streamlined the permitting process for sites covered under CERCLA, RCRA, NEPA, CWA, and TSCA and have reduced the average time for progressing from initial site screening to approved Record of Decision by 50 percent. The Core Team approach has resulted in documented cost savings of more than $10 million.

Attachment 1 (cont.)
Advances in Cost Effectiveness through Tailoring

Functional or Line Area	Effective Date(FY)	Benefit Derived from Tailoring (annual ongoing savings unless noted)
Solid Waste	FY02/FY03	Savings of $5M by stopping supercompaction and waste sort of low level waste (LLW), elimination of fire protection upgrade at E-area, consolidation of sampling and analysis efforts, deferral of Pond B dam, and other management challenges.
Spent Fuel	FY02	Savings of $10M in FY02 by the acceleration of K Area Spent Fuel Basin shutdown and RBOF deinventory, elimination of 30 positions, maintenance and operations efficiencies, and material reductions.
Project Design and Construction	FY04 and beyond	Estimated cost avoidance of $4.5M/year from proposed changes to Program and Project Management for the Acquisition of Capital Assets - DOE O 413.3 3 and an additional one-time cost avoidance of $1.1M for Capital Line Item Projects. We have submitted proposal to DOE-SR to perform only internal validation of the earned value management system (EVMS).

Attachment 2
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Maintenance Management – DOE O 433.1	Previous approved exemption from maintenance history system requirement. DOE agreed WSRC does not and will not have this capability. Significant cost avoidance from this exemption.	None requested at this time.	N/A	N/A	N/A
Environmental Protection - DOE O 450.1	No formal change requests to date although significant cost savings have been achieved in FY02 and FY03 ($4.5M) though other tailoring actions including 2 Six Sigma reviews which yielded $500K/year savings. Another Six Sigma review is in progress related to gathering chemical usage information pertinent for inclusion in the Form R report, an environmental report submitted each year containing a list of chemicals released to the atmosphere in the past year above given thresholds. The Six Sigma effort will examine how we obtain this information on air emissions and how we can tailor this process. Expected completion in February 2004.	None requested at this time.	N/A	N/A	N/A
ES&H Protection Standards - DOE O 5480.4	No formal change requests to date. Only three requirements are in the S/RID requirements related to this Order. Two are related to crane safety and one to electrical safety and all have consensus standards as the basis for the requirement.	None requested at this time.	N/A	N/A	N/A

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Packaging and Transportation Safety - DOE O 460.1A (now 460.1B)	Reconsideration of the requirements in Order 460.1A (now 460.1B) resulted in the implementation of a risk-based approach for onsite transport capitalizing on DOT regulations resulting in a cost savings of $3M in program cost; changing from a complex, Type B container to Type A drums for onsite transport of tansuranic (TRU) waste resulting in $400K per year of savings; and reduction in the number of Onsite Safety Assessments (from 34 to 25) with one-time savings of another $450K.	No further requests at this time.	N/A	N/A	N/A
Departmental Materials Transportation of Material of National Security Interest - DOE 460.2	No formal change requests to date.	None requested at this time.	N/A	N/A	N/A
Packaging and Transfer (Defense Materials) - DOE O 461.1	No formal change requests to date.	None requested at this time.	N/A	N/A	N/A

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Personnel Selection, Qualification and Training - DOE O 5480.20A	Formal exception for Fissionable Material Handlers from certification in 100 areas, K-reactor, L-Reactor and RBOF facilities through the training Implementation Matrix (TIM) for those facilities	**There are several areas of requested relief:** • **Exception for all site Fissionable Material Handlers from certification based on over four years of precedence as noted (will pursue through S/RID change)** • **Exception from the 2-year requalification requirement for facility operators (evaluating extension or elimination request) based on operator proficiency due to aggressive continuing training and ongoing drills which train, evaluate, and correct operator performance and overall maturity of the workforce (e.g.. some have been qualified for over 15 years)** • **Change abnormal/emergency procedure training from annual to biennial based on the 2S and emergency preparedness (EP) drills and exercises that train and test operations personnel on normal, abnormal and emergency actions.**	Significant cost avoidance estimated at greater than $500K/year	DOE-SR	H, M, M, H, M

Note: The priority nomenclature (last column) for the above follows that in Table 1of Attachment 4 in the following order: Net Savings, Minimal Risk, Approval Authority, Minimal Effect of Change, and Minimal Time to Implement.

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Identification and Protection of Unclassified Controlled Nuclear Information - DOE O 471.1A	Previously approved deviation from encryption of UCNI with a cost avoidance estimated at over $3M for not purchasing encryption software for telephone, computers, and faxes.	**Cancel Local UNCI guide and revise Sensitive Facilities List to be consistent with HQ guidance. This is a locally imposed requirement and will require local approval to implement.**	Cost avoidance in reviews and protection estimated at $500K per year.	DOE-SR	M, H, M, H, H
Control and Accountability of Nuclear Materials - DOE O 474.1A	Previously approved deviation for Spent Fuel Program Material Balance Area (MBA) Custodian. Did not have to staff a full time position resulting in a cost avoidance of $80K	**Eliminate safeguards accountability tracking for SR TRU Waste Shipments to WIPP. There is no requirement for this action and goes above and beyond the Order. This is a locally imposed requirement and will require local approval to implement.**	Estimated productivity savings of .5 FTE/$40K (less than $100K/year).	DOE-SR	L, H, M, M, H
		Eliminate receipt measurement of Safe Secure Transport (SST) shipments for Onsite transfers. These shipments are done under a guarded condition and therefore measurement of receipt from one onsite facility to the next is not necessary. This will require a deviation from the Order.	Cost avoidance estimated at greater than $100K and less than $500K/year	DOE-SR	M, H, M, M, H
		Termination of safeguards (measurements and accountability) on depleted Uranium and Deuterium. As soon as this material is declared as waste there is no requirement for Safeguards. We want to consider this material waste when it is packaged versus when it is being transported. This will eliminate the safeguards of this material while it is awaiting shipment. This may require a deviation from the Order or a simple change in the interpretation of when the material is declared waste.	Cost avoidance estimated at less than $100K/year	DOE-SR	L, H, M, M, M

Note: The priority nomenclature (last column) for the above follows that in Table 1of Attachment 4 in the following order: Net Savings, Minimal Risk, Approval Authority, Minimal Effect of Change, and Minimal Time to Implement.

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Safeguards and Security Program - DOE O 470.1, Chg. 1	Previously approved deviation for Critical System Elements corrective maintenance which yielded a savings of greater than $100K/year for maintenance overtime.	**Extend survey periodicity to every 24 months from current 12 months for DOE audits on Safeguards and Security Program. The Order currently allows for this and external security audits have been very favorable for several years. This only needs local DOE agreement. No formal requirement change is needed.**	Estimated cost avoidance of $40,000 per survey (6 surveys per year) (greater than $100K and less than 500K/year). There would also be cost savings potential for DOE-SR for this change.	DOE-SR	M, H, M, H, H
	A request for modification to the Site Security Posture (SEO-2003-00038) with productivity improvements estimated at greater than $100K and less than $500K/year has been sent to DOE-SR and is pending approval.		Productivity savings estimated at greater than $100K and less than $500K/year	DOE-SR	M, H, M, H, H
		Eliminate PSAP polygraph requirements. We believe the current program is being over interpreted for closure sites like SRS versus weapons assemble locations like Pantex. This will expedite the PSAP process and eliminate the cost of purchasing polygraph services to come to SRS or to send people to offsite location for this service. This will require a deviation from the Order and DOE-HQ approval.	Estimated cost savings of greater than $100K but less than $500K per year	DOE-HQ	M, H, L, M, H

Note: The priority nomenclature (last column) for the above follows that in Table 1of Attachment 4 in the following order: Net Savings, Minimal Risk, Approval Authority, Minimal Effect of Change, and Minimal Time to Implement.

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Federal Facility Agreement – ADN-89-05-FF	The structure and execution of the Federal Facility Agreement was inconsistent with the objectives of accelerated cleanup. Through a process of negotiation with both DHEC and EPA, SRS has been able to modify and restructure various execution processes in the FFA such that they support acceleration and a reduction in time necessary to complete the program. This is embodied in the FY04 Appendix E, October 1, 2003. EPA and DHEC have indicated they have no major problems with the Appendix as written. The implementation of the Core Team approach and other partnering strategies have streamlined the permitting process for sites covered under CERCLA, RCRA, NEPA, CWA, and TSCA and have reduced the average time for progressing from initial site screening to approved Record of Decision by 50 percent. The Core Team approach has resulted in cost savings of more than $10 million.	No further requests at this time, however the Core Team, which includes the Regulators, is continually evaluating this and other requirements.	N/A	N/A	N/A

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Program and Project Management for the Acquisition of Capital Assets - DOE O 413.3	Tailoring for Capital line Item Projects will be conducted on a project-by-project basis and will be commensurate with the size, risk and complexity of the project. WSRC has proposed in our Compliance Assessment and Implementation Report (CAIR) (WSRC-IP-93-668-425) that the requirement that Earned Value Management System for projects greater than $20M be certified as compliant with ANSI/EIA 748 be fulfilled by a self-evaluation and certification conducted in accordance with ANSI/EIA 748, section 5.1. WSRC's approach to tailoring 413.3 for the EM Clean-up contract scope of work is detailed in the attachments in the Project Management System Description (PMSD) approved November 26, 2003. This approach is in accordance with stipulations in Contract Modification M100 and implements tailored 413.3-1 requirements at the Project Baseline Summary (PBS) level of the site Work Breakdown Structure (WBS).	No further requests at this time.	N/A	N/A	N/A

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Program and Project Management for the Acquisition of Capital Assets - DOE O 413.3, cont.	This approach is estimated at yearly and one time cost avoidances of $4.5M and $1.1M respectively. Additional accepted and agreed upon tailoring opportunities for SGCP are documented in ERD-EN-2003-0237, *Savannah River Site, Soil and Groundwater Closure Projects, Tailored Approach for the Implementation of the Department of Energy Order 413.3, Program and Project Management Acquisition of Capital Assets.* These include: • Establishing equivalence between required regulatory documents and critical decisions. • Ensuring language describing changes that required DOE-HQ Configuration Control Board notification /approval is clear and consistent with other contract documents. These approaches are currently in practice and will be formally incorporated into the next revision of the PMSD.	(cont.)	(cont.)	(cont.)	(cont.)

Attachment 2 (cont.)
Requirements Tailoring

Directive	Past or Current Tailoring	Future Tailoring Request Summary	Expected Benefits	Approval Level	Priority Results
Glass Waste Acceptance Product Specifications – EM WAPS and Waste Glass Quality Assurance Requirements – DOE-RW-0333P	Modification of the sampling strategy for DWPF and concurrence by DOE to eliminate sampling and analysis of the DWPF Melter. Also DOE approved a disposal path for glass that accumulates on the Melt Cell floor via placing the glass in a canister being filled with molten glass. This canister disposal path for this accumulated glass has decreased the risk for equipment failure and the associated cost and time delays for canister production. This also identified a path for disposal that was acceptable in lieu of designing alternate disposal containers, etc.	**Eliminate the glass durability requirement. The glass durability requirement is no longer necessary due to DOE crediting the Yucca Mountain disposal package itself and not the borosilicate waste form/steel canister placed in the disposal package. To accomplish this, the DWPF glass durability requirements in the DOE-RW Waste Acceptance System Requirements Document (WA-SRD) and the Yucca Mountain License Application (higher tier documents) would need to be eliminated. Unless these are changed, the EM WAPs and DOE-RW-0333P (if appropriate) cannot be changed.**	Remove all QA hold points related to glass quality as well as permit a reduction of the qualification work required for new sludge batches. Productivity savings estimated at greater than $100K and less than $500K/year Note: This would also permit similar benefits at the Hanford and Idaho DOE facilities.	DOE-HQ (including DOE-SR, DOE-EM, and DOE-RW)	M, H, L, L, L

Note: The priority nomenclature (last column) for the above follows that in Table 1of Attachment 41of Attachment 4 1of Attachment 4 in the following order: Net Savings, Minimal Risk, Approval Authority, Minimal Effect of Change, and Minimal Time to Implement.

Attachment 3
Cancelled/Superseded Directives

Source Document Number in S/RID	Title	Date	Status
DII 151.1.1A	Comprehensive Emergency Management System	10/29/2001	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 225.1.1A	Accident Investigations (superseded by DII 225.1.1B, admin changes only, not incorporated into S/RID)	2/18/1999	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 251.1.1A	Directives Compliance System	12/12/1997	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 362.2.1B	Personnel Selection, Qualification & Training for DOE Nuclear Facilities	3/29/2002	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 410.1.1B	Conduct of Operations Requirements for DOE Facilities	3/29/1999	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 420.1.1A	Natural Phenomena Hazards (NPH) Mitigation	3/29/1999	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 440.1.1A	Fire Protection Criteria Established by DOE-SRS	7/23/2002	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 442.1.1A	Employee Concerns Program	4/17/2000	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 450.4.1A	Authorization Agreements	2/28/2001	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 451.1.1B	National Environmental Policy Act Compliance Program	1/27/1999	Cancelled by DOE-SR letter AA-03-007, August 19, 2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DII 5530.3.1B	Radiological Assistance Program (superseded by DII 153.1.1A, Admin. changes only)	8/5/1996	Cancelled by DOE-SR letter AA-03-007, 8/19/2003. Ongoing discussions being held with DOE-SR to determine S/RID disposition.
DOE O 151.1	Comprehensive Emergency Management System	10/29/2001	Superseded by DOE O 151.1A (dated 11/1/2000), admin. changes only. Since then, DOE O 151.1A has been superseded by DOE O 151.1B (dated 10/29/2003, received 11/20/2003). Applicability assessment is in progress.
DOE O 225.1	Accident Investigations	10/26/1996	Superseded by DOE O 225.1A (dated 11/27/1997), admin changes only. Not incorporated in the S/RID.
DOE O 430.1A	Life-Cycle Asset Management	9/24/2003	Superseded by DOE O 430.1B. (Real Property Asset Management, dated 8/19/2003, received 10/1/2003). Applicable to WSRC, but additional requirements not recommended for S/RID inclusion as no value will be added and the recommendation will avoid any additional costs.
DOE O 5480.8A	Contractor Occupational Medical Program	3/27/1995	Replaced by DOE O 440.1A, however, agreement between DOE-SR and WSRC to retain in the S/RID as it provides a level of detail that guides medical program implementation consistent with medical profession.

Attachment 4
Requirements Tailoring Guidelines and Prioritization Model

"Requirements" either externally imposed or internally imposed are established from a variety of sources at SRS. Some are matters of Federal Law, others are contractually driven, and some are driven by the way WSRC has chosen to conduct business. Individual requirements are established or imposed for a variety of purposes. They range from measures to protect the health and safety of workers and the public, to measures that protect national security interests, to measures that simply permit work to be conducted safely. Requirements generally culminate in a set of controls (administrative or engineered) that are to be followed when conducting work.

In the context of this guidance, tailoring of requirements is directed at ISMS Principle 6, "Administrative and engineering controls to prevent and mitigate hazards are tailored to the work being performed and the associated hazards". Tailoring of requirements can involve a broad range of opportunities. Depending on the specific requirements involved, some tailoring can be implemented by WSRC without any external approvals and other tailoring will require external approvals (typically DOE-SRS or DOE-HQ, but possibly other regulators) before implementation. Some examples of tailoring of requirements are changing a procedure, changing the applicability of a requirement, eliminating a requirement, modifying a requirement, adopting a different requirement, and formal exemption from a requirement.

The first test that must be met, when defining any particular internal or external requirement tailoring opportunity is to ensure that the desired change is safe and will actually result in a cost-effective difference in the way that work is conducted at SRS. If a change does not result in any cost-effective difference, then it is generally not worth pursuing. A potentially effective way to determine such opportunities is to engage line organizations that conduct particular work activities with the simple question..."What is it that you currently do that provides little or no value when conducting work?"

Once a specific cost-effective tailoring opportunity is identified, the next step is to determine the exact driver for the way the work is conducted today. Often the answer will be tied to a particular procedure or process that is used when conducting the work.

With the procedural controls that drive the work defined, the next step is to identify the exact change desired. Once this is specifically defined, then it can easily be determined if implementation of the desired change requires internal WSRC approval or approval from an external entity (DOE or others). The following possibilities are typical:

- The change is solely in WSRC's control and can be implemented upon issuance of a revision to the governing procedure(s).
- The change cannot be implemented until an S/RID revision is submitted to and approved by DOE-SRS.
- The change cannot be implemented until a formal Exemption is requested from and approved by DOE-SRS.
- The change cannot be implemented until a formal Exemption is requested from and approved by DOE-HQ (through DOE-SRS).
- The change cannot be implemented until an external regulator (e.g., SC DHEC) grants an appropriate form of relief.

The methods and processes to pursue the particular types of external approvals delineated above are outlined in the WSRC 8B, Compliance Assurance Manual.

Pursuing opportunities for tailoring may involve some amount of initial cost and, especially for those involving external approvals, have varying levels of potential success (i.e., approval). Therefore, those with little projected savings and low potential for success should receive a low priority (if they are pursued at all). However, those tailoring opportunities with high projected savings and high potential for success should receive a high priority.

Attachment 4, cont.
Requirements Tailoring Guidelines and Prioritization Model

The following table outlines simple guidance to be used by management to prioritize requirements tailoring opportunities. This is intended to assist management in making decisions on which opportunities to pursue. It is not intended as a decision model, only a management tool. This model provides guidance for prioritizing and supporting the decision to pursue formal requirements tailoring as well as providing a framework for the analysis and dataset that are to be included in every formal request for change.

The five considerations identified in the following table (as a minimum) will be specifically addressed in formal requests for requirements tailoring/changes.

- Net Savings - Savings considerations should include discussion of the costs to implement as well as the cost savings, productivity improvement and any cost avoidances. Net savings are defined as the projected annual savings minus the implementation costs.
- Minimal Risk – Risk considerations are equally important in the analysis and prioritization model. Very careful consideration must be given to any additional risks associated with the planned tailoring activities. We principally evaluate health and safety, environmental and national security impacts, but other business impacts should also be considered. It is important to note that acceptable risk must be clearly defined during the analysis and in the request. Any tailoring action that is deemed to have an unacceptable level of risk must be revised before proceeding.
- Approval Authority – The level of approval is a factor to consider and to be identified in any tailoring action. It should be expected and planned that WSRC and DOE-SR approvals will likely be more expeditious then DOE-HQ or external stakeholder approvals.
- Minimal Effect of Change – Careful analysis of the total effect of change is critical to the success of any planned tailoring activity. Change analysis must be comprehensive and go beyond one's typical sphere of control. Change considerations include processes, documents, measurement and reporting, organizational change, interdependencies, stakeholders, etc. These changes can have a significant impact on the net savings. If the effect of change has not been evaluated or is unknown, the request for change is not yet ready for consideration or transmittal.
- Minimal Time to Implement – This consideration is for implementation time only and it assumed to begin once the tailoring activity has been approved.

Net Savings (Projected annual savings less implementation costs)		**Minimal Risk** (Health/Safety, Environmental, and National Security impact)		**Approval Authority** (Final authority necessary for implementation)		**Minimal Effect of Change** (Other documents, processes, etc. that need changed to implement)		**Minimal Time to Implement** (Duration until implemented in field)	
More than $500K	H	Decreased or same	H	WSRC	H	None or few/ minor changes	H	Less than 90 days	H
$100K to $500K	M	Acceptable increase	M	DOE-SRS	M	Known and planned (up to major changes)	M	90 days to 1 year	M
Less than $100K	L	Unacceptable increase[1]	L	DOE-HQ or Others	L	Unknown[2]	L	More than 1 year	L

Table 1 – Requirements Tailoring Prioritization
(H= High, M= Medium, L= Low)

[1] A tailoring proposal with an unacceptable risk increase cannot be pursued. It must be revised to at least get the risk to an acceptable level.
[2] A tailoring proposal with unknown changes to implement cannot be fully pursued or even clearly estimated for cost-savings. Therefore, the effect of the change on other documents, processes, etc. needs to be identified before fully proceeding.