

DOE TECHNICAL STANDARDS PROGRAM PROCEDURES

DOE-TSPP-3
Revision: 5
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USE OF VOLUNTARY CONSENSUS STANDARDS AND INTERACTION WITH STANDARDS DEVELOPMENT ORGANIZATIONS

U.S. Department of Energy
Office of Nuclear Safety Policy and Assistance
Washington, D.C. 20585

Standards Use / Participation

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CONTENTS

	<u>Paragraph</u>	<u>Page</u>
1.	SCOPE	1
	1.1 Purpose	1
	1.2 Applicability	1
2.	USING VOLUNTARY CONSENSUS STANDARDS	1
	2.1 General.....	1
	2.2 Adoption	1
	2.3 Identifying and Referencing Voluntary Consensus Standards	2
	2.4 Applying Voluntary Consensus Standards	2
3.	GENERAL GUIDANCE FOR INTERACTION WITH NON-GOVERNMENT STANDARDS BODIES	2
	3.1 Membership.....	2
	3.2 Official DOE Representation	2
	3.3 Participation.....	3
	3.4 Voting by DOE Representatives.....	4
	3.5 Administrative Fees and Organizational Memberships	4
	3.5.1 Preferred Method.....	5
	3.5.2 Alternate Method	5
	3.6 Review of Participation	6
4.	REPORTING ON VOLUNTARY CONSENSUS STANDARDS AND PARTICIPATION IN STANDARDS DEVELOPMENT ORGANIZATIONS	6
ATTACHMENT A:		
	RECORD OF NON-GOVERNMENT STANDARDS ACTIVITY, DOE F 1300.2.....	7

1. SCOPE

1.1 Purpose

This procedure identifies the process by which DOE adopts Voluntary Consensus Standards (VCSs) and provides guidance for the interaction of DOE and contractor employees with Standards Development Organizations (SDOs).

1.2 Applicability

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

2. USING VOLUNTARY CONSENSUS STANDARDS

2.1 General

Nationally recognized technical, professional, and industry associations and societies, referred to as SDOs or voluntary consensus standards bodies, prepare standards that can be used by DOE. Consistent with Public Law (PL) 104-113 and OMB Circular A-119, DOE Order 252.1 requires that (1) DOE use Voluntary Consensus Standards (VCSs) to the maximum extent possible in the conduct of its activities, and (2) DOE and DOE contractor personnel participate in the activities of SDOs, either in the development or revision of VCSs that address specific Departments needs or as members of management boards for the SDOs. For these reasons, DOE/contractor employees are encouraged to participate in the development of VCSs. In some cases, topical committees recognized by the Technical Standards Program provide another means for DOE/contractor personnel to participate in these activities.

2.2 Adoption

DOE adopts VCSs by referencing them in policy statements, requirements documents (e.g., rules and Orders), guides, contract documents, site/facility implementation plans, and DOE-approved sets of "work-smart" standards. Adopted VCSs are listed in DOE-TSL-1, *Department of Energy Standards Index*. The applicability of VCSs to DOE contractors is stipulated as part of Contractor Requirements Documents, sets of "necessary and sufficient" (e.g., work-smart) standards incorporated in their contracts, and site/facility implementation plans. VCSs are also considered to be adopted when invoked by authorization basis

documents (such as safety analysis reports) or if they are part of the "Code of Record" in facility design. Another method for adopting technical standards is recognized by the "Federal Standardization Manual 2000" -evaluating and adopting standards on an agency basis, as is done by the Nuclear Regulatory Commission.

2.3 Identifying and Referencing Voluntary Consensus Standards

VCSs are identified by their document numbers and revision. References to VCSs in DOE documents include the date of issue, revision, or other designation that makes the standard unique. DOE contractors should refer to their contracts, site/facility authorization basis documents/implementation plans, and "work-smart" standards sets for the correct revision to be used.

2.4 Applying Voluntary Consensus Standards

DOE use of a non-Government standard may consist of restating the text of a standard (with SDO permission), referencing the non-Government standard in a DOE document, or developing procedures based on a standard that meet the intent of the standard.

3. INTERACTION WITH STANDARDS DEVELOPMENT ORGANIZATIONS

3.1 Membership

Any individual designated as a DOE representative (see paragraph 3.2) to a SDO is authorized to participate in the activities of that body as an official DOE representative at DOE expense. Such participation, while encouraged by the Federal policy in OMB Circular A-119 and DOE Order 252.1, must, however, be directly related to the missions and activities of DOE.

3.2 Official DOE Representation

Official DOE representatives to SDOs are designated by senior line management (Headquarters or field organizations) on form DOE F 1300.2 (Attachment A). This type of participation encourages good relationships between Government and the private sector and often leads to DOE adoption of VCSs or official DOE participation with an SDO.

There is a difference between official DOE representation and other participation by DOE employees and contractors in VCSs activities. Many DOE or contractor employees, because of personal or professional interest, are members of technical or professional societies and associations. Such membership does not constitute official DOE representation.

Persons appointed as official DOE representatives are expected to express views that are in the public interest and, as a minimum, do not conflict with the interests and established views of DOE. When DOE participates with other Federal agencies on a SDO, the DOE representative coordinates his/her views (refer to TSPP-6) so as to present, whenever feasible, a single, unified position and, when not feasible, a mutual recognition of differences (note that DOE topical committees may also serve as a vehicle for establishing positions on standards, both within DOE and between DOE and other Federal agencies). DOE participation on SDOs does not, of itself, connote DOE agreement with or endorsement of decisions reached by such bodies or of standards approved and published by non-SDOs.

DOE representatives serving as members of standards-developing groups should participate actively in the standards activities of those groups but, in doing so, should not seek to dominate. Active participation includes involvement in discussions and technical debates, registering of opinions, and serving, if selected, as chairpersons or in other official capacities. DOE representatives may vote at each stage of standards development. Participation by DOE representatives in the policy-making process of SDOs is encouraged, particularly in matters such as establishing priorities; developing procedures for preparing, reviewing, and approving standards; and creating standards-developing groups. However, to maintain the private, non-Government nature of such bodies, DOE representatives should refrain from decision-making involvement in the internal day-to-day management of such bodies (e.g., selection of salaried officers or employees, establishment of staff salaries, and administrative policies).

3.3 Participation

DOE and contractor participation on SDOs is encouraged under Federal and DOE policy. DOE and contractor personnel participating on SDOs should complete form DOE F 1300.2, which is available from Technical Standards Managers or can be downloaded from the Technical Standards Program Home Page. The OMB-approved form serves to (1) record the number of DOE and contractor personnel participating in standards development/management activities for reporting to the Office of Management and Budget (in accordance with PL 104-113 and OMB Circular A-119) and (2) ensure that SDOs are supported by DOE when that support is deemed important to the Department's missions and activities. DOE-TSL-4, *Directory of DOE and Contractor Personnel Involved in Non-Government Standards Activities*, provides a listing of DOE Component personnel participating on SDOs.

DOE F 1300.2 is submitted to the Technical Standards Program Office for each individual to record all SDO participations for that individual. Resubmittal of this form should occur only when there is a change.

Note: When individuals no longer participate with SDOs for various reasons (such as retirement, reassignment, relocation, budgeting), then this information (their names) should also be conveyed to the TSPO (along with the records of participations).

DOE and contractor personnel participate on VCSs development working groups when one or more of the following criteria have been met:

- a. DOE has determined that a standard is needed for a DOE activity and none currently exists.
- b. A standard under development by the working group is related to DOE's mission and activities and will be available to DOE for use within an acceptable time period.
- c. The standard will further national goals and objectives, such as increased use of the metric system of measurement; use of environmentally sound and energy-efficient materials, products, systems, services, or practices; and improvement in public health and safety, as outlined in OMB Circular A-119.

DOE field organizations should encourage contractor participation in SDOs. Contractor participation is approved by the Operations Office. The contractor should submit form DOE F 1300.2 to the Operations Office for approval before committing to participation. The Operations Office line management approves by signing the appropriate block of the form and sending the form to the Technical Standards Program Office.

Contractors may, at their own expense, appoint representatives to SDOs. DOE fully supports such participation; however, this is not considered DOE representation and the individual participants should take specific measures to ensure that they are not recorded or recognized as representatives of DOE. If the individual is compensated by DOE for the participation, he or she should be designated as a DOE representative on DOE F 1300.2, approved by DOE line management, and recorded by the Technical Standards Program Office.

3.4 Voting by DOE Representatives

DOE representatives may vote on actions arising in the normal course of their participation in SDOs. However, a DOE representative should abstain when there is a conflict of interest for DOE or its representative.

3.5 Administrative Fees and Organizational Memberships

DOE employees who, at Government expense, participate in standards activities of SDOs should do so in their governmental capacities as specifically authorized DOE representatives. To do this, some SDOs require payment of organizational or individual fees. DOE is prohibited from paying membership fees for individuals (see Decisions of the Comptroller General B-177596 and B-160579); however, there is no restriction on paying administrative fees to cover the costs of selected DOE representatives. Assuming participation costs are supported by DOE policy, the final decision to pay is in the hands of the line management official.

When administrative fees for individual representatives have been paid by DOE, DOE retains the right to substitute alternate personnel. However, nothing precludes any DOE employee or contractor from joining and participating in any SDO at the individual's own time and expense.

Organizational memberships in SDOs may be acquired at the DOE level or at the field office, laboratory, contractor, or other level, as appropriate. Benefits to DOE, such as free or discount publications, technical reports, voting privileges, and participation on planning boards, should be considered when making this decision.

DOE support to a VCSs activity should be limited to furthering DOE's missions and responsibilities. The total amount of Federal support should be no greater than that of equivalent private sector participants in that activity except when it is in the best interest of DOE to develop a standard or revision to a standard and its development is unlikely to occur without such support. DOE support, subject to legal and budgetary authority, may include:

- direct financial support (e.g., grants, memberships, and contracts),
- administrative support (e.g., travel costs, hosting of meetings, and secretarial functions),
- technical support (e.g., cooperative testing for standards evaluation and participation of DOE personnel in the activities of standards developing groups),
- joint planning with SDOs to facilitate a coordinated effort in identifying and developing needed standards, and
- participation of agency (i.e., DOE/contractor) personnel in voluntary standards activities.

The following methods are available for arranging payment of administrative fees required for participation in SDOs.

- 3.5.1 Preferred method. Upon receipt of the annual administrative fee invoice from the SDO, a requisition is submitted to the procurement office requesting a purchase order for the total fee for participation. The statement of work and the justification identifies the specific SDO as the only source for this service. When using this method, the statement of work should read as follows:

"The administrative fee is to cover the participation of the below listed individual(s) for the period indicated in the (specific NGSB) standards development process on the committee or committees identified as part of their official duties. The Government reserves the right to substitute representatives if necessary. The listed individuals' participation is in accordance with DOE Order 252.1. Participation and payment of administrative fees do not grant a personal membership to any of the identified individuals. All rights and benefits of membership accrue to the DOE activity and the U.S. Government."

3.5.2 Alternate method. If payment is made directly to the SDO staff by an individual representative, a receipt should be obtained and submitted for reimbursement. The justification should be stated as the statement of work noted previously.

3.6 Review of Participation

Participation by DOE/contractor employees (whether or not on behalf of DOE) in the activities of SDOs is subject to the laws and regulations that apply to participation by federal employees in the activities of outside organizations. While it is anticipated that participation in a committee that is developing a standard would generally not raise significant issues, participation as an officer, director, or trustee of an organization would raise more significant issues. As such, DOE line management should involve the organization's ethics officer or other authority, as appropriate, before authorizing support for or participation in a SDO.

When SDO participation is limited by matters such as budget, travel restrictions and numbers of staff, then adequate representation from DOE can be maintained through participation with appropriate DOE Topical Committees, where selected members are designated to represent DOE positions at SDO functions.

4. **REPORTING ON VOLUNTARY CONSENSUS STANDARDS USE AND PARTICIPATION IN STANDARDS DEVELOPMENT ORGANIZATIONS**

On an annual basis, the Technical Standards Program Office develops input for submittal by the DOE Standards Executive to the Office of Management and Budget (through the National Institute of Standards and Technology, NIST) on the following information required by PL 104-113 and OMB Circular A-119:

- Instances where DOE elected to develop an internal standard rather than use an existing non-Government standard, including an explanation (to be provided by the Preparing Activities) on why the use of the non-Government standard would be inconsistent with PL 104-113.
- Number of SDOs in which there is DOE participation, and the number of agency participants.
- Number of voluntary standards adopted since the last report (i.e., last fiscal year) that resulted from DOE participation in a standards-developing group.
- Number of DOE standards replaced by voluntary standards since the last report.
- An evaluation of the effectiveness of the OMB Circular A-119 guidelines and recommendations for any changes.

The information is to be submitted to NIST by December 31st of the following fiscal year (i.e., information of DOE's FY 1998 activities must be submitted by December 31, 1998).

**ATTACHMENT A
RECORD OF NON-GOVERNMENT STANDARDS ACTIVITY, DOE F 1300.2
(PAGE 1 OF 2)**

DOE F 1300.2 (07-94) All Other Editions Are Obsolete	U.S. DEPARTMENT OF ENERGY RECORD OF NON-GOVERNMENT STANDARDS ACTIVITY (See reverse side for instructions)	OMB Control No. 1910-0900 OMB Burden Disclosure Statement on Reverse
1. Type of Submittal <input type="checkbox"/> Initial Submittal <input type="checkbox"/> Revision of information previously submitted <input type="checkbox"/> Termination of membership <i>(complete blocks 1-8f only)</i>		
2. Name (last, first, initial)	3. Title	4. Organization Routing Symbol
5. Mailing Address	6. Employment Status <input type="checkbox"/> DOE Employee <input type="checkbox"/> Other (specify) _____	
7. Office Telephone Number () _____ FAX () _____	8a. Name of Non-Government Standards Body (NGSB) Country _____	
8b. Name of Main Committee Main Committee Number _____	8b. Name of Main Committee Main Committee Number _____	
8c. Type of Main Committee (check one) <input type="checkbox"/> Standards Management <input type="checkbox"/> Standards Related <input type="checkbox"/> Standards Writing <input type="checkbox"/> Other (specify) _____	8c. Type of Main Committee (check one) <input type="checkbox"/> Standards Management <input type="checkbox"/> Standards Related <input type="checkbox"/> Standards Writing <input type="checkbox"/> Other (specify) _____	
8d. Name of Subcommittee Subcommittee Number _____	8d. Name of Subcommittee Subcommittee Number _____	
8e. Name of Task or Working Group (WG) Task or WG Number _____	8e. Name of Task or Working Group (WG) Task or WG Number _____	
8f. Other Activity if not listed above (specify) Number _____	8f. Other Activity if not listed above (specify) Number _____	
9. Your position in the activity <input type="checkbox"/> Member <input type="checkbox"/> Vice Chair <input type="checkbox"/> Alternate <input type="checkbox"/> Chair <input type="checkbox"/> Secretary <input type="checkbox"/> Delegate <input type="checkbox"/> Technical Advisor <input type="checkbox"/> Other (specify) _____	9. Your position in the activity <input type="checkbox"/> Member <input type="checkbox"/> Vice Chair <input type="checkbox"/> Alternate <input type="checkbox"/> Chair <input type="checkbox"/> Secretary <input type="checkbox"/> Delegate <input type="checkbox"/> Technical Advisor <input type="checkbox"/> Other (specify) _____	
10. Voting Status (check one) <input type="checkbox"/> Voting <input type="checkbox"/> Nonvoting	10. Voting Status (check one) <input type="checkbox"/> Voting <input type="checkbox"/> Nonvoting	
11. Representation <input type="checkbox"/> DOE <input type="checkbox"/> Other (specify) _____		
12. Brief scope of the activity	13. Signature of Participant	Date
	14. Signature of Approving Official	Date
	15. Title of Approving Official	
Mail to: Technical Standards Program Office c/o Performance Assurance Project Office P.O. Box 2009, Oak Ridge, TN 37831-8065		



Printed with soy ink on recycled paper

ATTACHMENT A
RECORD OF NON-GOVERNMENT STANDARDS ACTIVITY, DOE F 1300.2
(PAGE 2 OF 2)

DOE F 1300.2
 (07-94)
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OMB Control No.
 1910-0900

INSTRUCTIONS

OMB Burden Disclosure Statement

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Office of Information Resources Management Policy, Plans and Oversight, Records Management Division, HR-422 - GTN, Paperwork Reduction Project (1910-0900), U.S. Department of Energy, 1000 Independence Avenue, S.W., Washington, DC 20585; and to the Office of Management and Budget (OMB), Paperwork Reduction Project (1910-0900), Washington, DC 20503.

1. Indicate type of submittal by placing a check mark in the appropriate block. Minor changes such as a new telephone extension or mailing address may be made by notifying the Technical Standards Program Office by telephone (615-574-0396). If recording termination of a membership, complete block 1-8f only. **[Note: Sections 8b through 10 must be completed for each committee, subcommittee, or working group of the NGSB noted in block 8a of which the participant is a member (each form can be used for 2 committees). Multiple forms may be necessary if the participant is a member of numerous activities within one NGSB or is a member of more than one NGSB.]**
2. Name of individual participating in a non-Government standards activity.
3. Title of person participating in a non-Government standards activity.
4. Organization of which the person is a member: U.S. Department of Energy (DOE) - list organization number (EH-1, ER-8, DP-42 etc.); Contractors list company name and DOE organization supported (Oak Ridge National Laboratory - ER, Westinghouse Savannah River Site - DP, etc.)
5. Mailing address of person participating in a non-Government standards activity.
6. Indicate whether the person participating in a non-Government standards activity is a direct DOE employee, or is a contractor.
7. Office telephone number and fax number.
- 8a. Enter the name of the NGSB and the country under whose auspices the standards committee is operating.
- 8b. Name (and number) of the Main Committee the standards group (subcommittee/working group etc.) reports to. Example: Nuclear Fuel Cycle - C26
- 8c. Type of Main Committee. (If only recording participation on a main committee, do not complete blocks 8d - 8f.
- 8d. Name (and number) of the Subcommittee. (Complete blocks 8d thru 8f to the lowest level group being recorded on this form.
- 8e. Name (and number) of the task or working group (WG).
- 8f. Include any working Sub-Group not listed above that the person participating in a non-Government standards activity is involved in.
9. Record your current or planned position in an activity.
10. Indicate whether the member is able to vote on issues brought before the NGSB committee. (Liaison members often do not vote.)
11. DOE employees and contractors who are formally designated by the appropriate senior line manager to participate in the activities of NGSBs as an official DOE representative should check the "DOE" block. DOE employees and contractors who are members of technical or professional societies and associations because of personal or professional interest should check the "Other" block.
12. Briefly describe the scope of the activity.
13. Signature of participant and date signed.
14. DOE employees and contractors who will be the DOE representative must obtain the signature of the Departmental Element or designated representative as Approving Official before submitting the form. Members not representing DOE are not required to obtain approval unless internal company procedures require higher level company authorization.
15. Title of Approving Official.