



Department of Energy

Washington, DC 20585

May 21, 1996

Mr. John D. Conway, Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, N.W.
Suite 700
Washington, D.C. 20004

Dear Mr. Conway:

Revised crosswalk reports have been prepared for DOE Order 440.1, "Worker Protection Management for DOE Federal and Contractor Employees" in accordance with the format agreed to by your staff. Our April 19, 1996, letter to Dr. Lester Etlinger explained changes to the Explosives Safety Manual (DOE M 440.1-1). Crosswalk reports have been enclosed as Enclosures 1-10 for each of the following old Orders:

DOE Order 3790.1B (all except chapter 8)
DOE Order 5400.1 (several provisions)
DOE Order 5480.1B (several provisions)
DOE Order 5480.4 (only Enclosure 2, para 2c-2e(8); Enclosure 3, para 2c-2e(7))
DOE Order 5480.7A
DOE Order 5480.8A
DOE Order 5480.9A
DOE Order 5480.10A
DOE Order 5480.16A
DOE Order 5483.1A

For each provision contained in an old Order, revised crosswalk reports indicate disposition in DOE Order 440.1, DOE C 440.1, DOE M 440.1-1, Implementation Guides for Worker Protection, Construction, Contractor Occupational Medical, Exposure Assessment, Fire Protection, or the Firearms Technical Standard (DOE-STD-1091-95). In addition, the revised crosswalk reports contain a "change description" and "basis for change." Additional information on the format and content of the revised crosswalk reports are contained in Enclosure 11. The preamble (Enclosure 12) developed for DOE Order 440.1, dated September 30, 1995, contains a thorough discussion of the development of DOE O 440.1 and the major issues resolved during formal coordination and final review by the Directives Management Board.

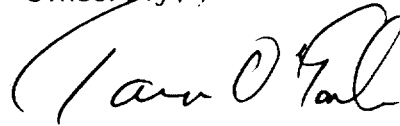
Our revised crosswalk reports should provide what is needed to understand the disposition of provisions from 10 old Orders and one mandatory manual, which were under the purview of the Worker Protection focus group during the Accelerated Directives Reduction Effort. Provisions from old Orders have been dispositioned in six general ways. In translating from old to new, changes can be characterized as follows: 1) no significant change, 2) captured under top-level worker protection requirements, 3) requirements/guidance added to new directives, 4) deleted, 5) changed to guidance, and 6) to be captured in a future guidance documents.



A review of the revised crosswalk reports will demonstrate that prescriptive, and in some cases unclear, old Order provisions have been replaced by performance-oriented requirements in DOE Order 440.1 which meet or exceed old requirements. Associated implementation guides and technical standards clearly communicate acceptable means for implementing requirements. Other old Order provisions have been moved to guidance or deleted, as appropriate.

The revised crosswalk reports have authenticated our original work and confirmed that no significant provisions in our old Orders are missing in the new Directives. Should you have any questions, please contact Bob Barber, at 301-903-3477, or Phil Wilhelm, at 301-903-5678.

Sincerely,



Tara O'Toole, M.D., M.P.H.
Assistant Secretary
Environment, Safety and Health

Enclosures

cc w/o enclosures:
L. Etlinger, DNFSB