

#### SNS-OPM 2.B-10 Unreviewed Safety Issue Procedure

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### Hand Processed Changes

HPC No.		Date		Page Nos.		<u>Initials</u>	
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Approved:	SNS Oper	ations Manager				D	ate
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Contact: Accelerator Safety Program Lead <u>SNS-OPM Editor</u>

#### SNS-OPM 2.B-10 Unreviewed Safety Issue Procedure

#### 1. <u>Purpose</u>

- 1.1 The Spallation Neutron Source (SNS) Unreviewed Safety Issue (USI) Procedure provides a means for evaluating whether a proposed activity or a discovered condition introduces an accelerator-specific hazard that is not adequately addressed by the current *Spallation Neutron Source Final Safety Assessment Document for Proton Facilities* (FSAD-PF) [7.1], current *Spallation Neutron Source Final Safety Assessment Document for Neutron Facilities* (FSAD-NF) [7.2], and approved *Spallation Neutron Source Accelerator Safety Envelope* (ASE) [7.3].
- 1.2 This procedure provides instructions for how to perform (1) USI Identification and Recognition and (2) USI Evaluation for proposed activities and discovered conditions at SNS.
- 1.3 The instructions provided in this procedure comply with the Department of Energy (DOE) Order (O) 420.2D, *Safety of Accelerators* [7.4] and the Oak Ridge National Laboratory (ORNL) Standards-based Management System (SBMS) *Accelerator Safety* management system [7.5].

#### 2. <u>Responsibilities</u>

- 2.1 The SNS Operations Manager is responsible for implementing the SNS USI Procedure.
- 2.2 The SNS Operations Manager or delegate is responsible for approving USI Evaluations.
- 2.3 Accelerator Safety Program personnel coordinate the SNS USI Procedure, manage documentation, assign document numbers, and appropriately store documents for long-term retention. Accelerator Safety Program personnel serve as subject matter experts (SME) for the SNS accelerator safety documentation and the SNS USI Procedure and help ensure the consistency and quality of documentation. Accelerator Safety Program personnel provide consultation, as requested, during all steps of the SNS USI Procedure. A list of Accelerator Safety Program personnel is provided in [7.7].
- 2.4 The USI Identifier is responsible for completing the USI Identification section of SNS-OPM-ATT 2.B-10.b, *Unreviewed Safety Issue Identification and Recognition Form*. USI Identifiers should use the questions provided in Table 1 of this procedure to help complete this section.

- 2.5 The USI Preparer is responsible for completing the USI Recognition section of SNS-OPM-ATT 2.B-10.b, *Unreviewed Safety Issue Identification and Recognition Form*. USI Preparers should use the questions provided in Table 2 of this procedure to help complete this section.
- 2.6 The USI Preparer is responsible for preparing the USI Evaluation in SNS-OPM-ATT 2.B-10.a, *Reviewed Safety Issue Documentation Form*. USI Preparers should use the questions provided in Table 3 of this procedure to help prepare the USI Evaluation.
- 2.7 The USI Reviewer is responsible for reviewing the USI Evaluation in SNS-OPM-ATT 2.B-10.a, *Reviewed Safety Issue Documentation Form*, to ensure quality and technical accuracy. The USI Reviewer also ensures the questions from Table 3 have been properly addressed.
- 2.8 The SNS Operations Manager can designate individuals to serve as USI Identifiers, USI Preparers, and USI Reviewers based on their knowledge or experience in lieu of the designated training.
- 2.9 SMEs are responsible for reviewing the USI Evaluation in SNS-OPM ATT 2.B-10.a, *Reviewed Safety Issue Documentation Form*, at the request of the USI Preparer to ensure technical accuracy in their field of expertise.

### 3. <u>Prerequisites</u>

3.1 None.

## 4. <u>Precautions</u>

- 4.1 If USI Evaluation determines that a proposed activity introduces accelerator-specific hazards not adequately addressed by the current FSADs and approved ASE, then DOE approval is required prior to implementation of the proposed activity.
- 4.2 If USI Identification and Recognition determines that a discovered condition has a credible potential to introduce accelerator-specific hazards not adequately addressed by the current FSADs and approved ASE, then promptly notify the SNS DOE Facility Representative.
- 4.3 If USI Evaluation determines that a discovered condition introduces acceleratorspecific hazards not adequately addressed by the current FSADs and approved ASE, then:
  - 4.3.1 Impacted operations shall be suspended immediately and put in a safe and stable configuration,
  - 4.3.2 A response plan to address the discovered condition shall be submitted to DOE for approval, and
  - 4.3.3 Once all required actions of the DOE-approved response plan are complete, evidence of completion shall be submitted to DOE with a request for approval to resume suspended operations.

#### 5. <u>Procedure</u>

- 5.1 The purpose of the SNS USI Procedure is to evaluate whether a proposed activity or discovered condition introduces an accelerator-specific hazard that is not adequately addressed by the current FSADs and approved ASE.
- 5.2 The SNS USI Procedure for proposed activities is initiated through the configuration management program as defined in *Neutron Sciences Directorate Policy on Configuration Management* [7.6].
- 5.3 The SNS USI Procedure for discovered conditions is initiated through identification by SNS staff.
- 5.4 Proposed activities that merit a USI Evaluation shall have approved Reviewed Safety Issue (RSI) documentation prior to implementation.
- 5.5 The SNS USI Procedure is separated into two broad steps: (1) USI Identification and Recognition and (2) USI Evaluation.
- 5.6 USI Identification and Recognition
  - 5.6.1 USI Identification and Recognition uses SNS-OPM-ATT 2.B-10.b, Unreviewed Safety Issue Identification and Recognition Form (Attachment 8.3).
  - 5.6.2 The USI Identification section of the form shall be completed by personnel that have completed USI Identifier training.
    - 5.6.2.1 There are no prerequisites for taking USI Identifier training.
    - 5.6.2.2 See Section 2.3 of this procedure for USI Identifier responsibilities.

#### NOTE:

USI Identification does not supplant normal line management notification requirements.

- 5.6.3 Using Table 1, USI Identifier Questions, USI Identifier determines if the proposed activity or discovered condition potentially merits a USI Evaluation.
  - 5.6.3.1 If the answer to any question in Table 1 could be yes, USI Identifier completes USI Identification section of SNS-OPM-ATT 2.B-10.b.
  - 5.6.3.2 If the answer to all questions in Table 1 is no, then no further action in this procedure is required.
- 5.6.4 The Brief Description of Proposed Activity or Discovered Condition block on the form should provide a brief description of the proposed activity or discovered condition and describe why it potentially merits a USI Evaluation, focusing on which question from Table 1 has a response that could be yes.
- 5.6.5 USI Identifier signs form.

- 5.6.6 USI Identifier sends form to Accelerator Safety Program personnel for completion of USI Recognition section. A list of Accelerator Safety Program personnel is provided in [7.7].
- 5.6.7 Accelerator Safety Program personnel insert a title and document number in the appropriate blocks on the form. The title should provide sufficient description to individualize the issue. It should also note which portion of the SNS is affected, either proton facilities or neutron facilities. Section 6, *Documentation*, of this procedure contains requirements for document numbering.
- 5.6.8 Accelerator Safety Program personnel indicate in the checkboxes whether the form is being filled out for a proposed activity or discovered condition.
- 5.6.9 Accelerator Safety Program personnel either complete the USI Recognition section of form (if they have completed USI Preparer training) or coordinate completion of USI Recognition section of form with personnel that have completed USI Preparer training.
  - 5.6.9.1 Completing (1) Safety Document Overview training and (2) USI Identifier training are prerequisites for completing USI Preparer training.
  - 5.6.9.2 See Section 2.4 of this procedure for USI Preparer responsibilities for completing USI Recognition section of form.

#### NOTE:

USI Identification and USI Recognition shall not be completed by the same person.

- 5.6.10 Using Table 2, *USI Recognition Questions*, USI Preparer determines if the proposed activity or discovered condition merits a USI Evaluation.
  - 5.6.10.1 USI Preparer completes USI Recognition section of SNS-OPM-ATT 2.B-10.b.
  - 5.6.10.2 A USI Evaluation is required if the answer to any question in Table 2 could be yes.
- 5.6.11 USI Preparer answers the question in the USI Recognition section of form. If the answer is yes, then a USI Evaluation is required. If the answer to the question is no, then no USI Evaluation is required.
- 5.6.12 The Justification for Response block should briefly explain why the proposed activity or discovered condition merits a USI Evaluation, focusing on which question from Table 2 has a response that could be yes.
- 5.6.13 USI Preparer signs form.
- 5.6.14 USI Preparer sends the signed USI Identification and Recognition form to Accelerator Safety Program personnel for (1) completion of USI Evaluation if the response to question on form is yes, and (2) document storage in accordance with Section 6, *Documentation*, of this procedure. A list of Accelerator Safety Program personnel is provided in [7.7].

#### 5.7 USI Evaluation

5.7.1 USI Evaluation uses SNS-OPM-ATT 2.B-10.a, *Reviewed Safety Issue Documentation Form* (Attachments 8.1 and 8.2).

	Docume	entation For	rm (Attachments 8.1 and 8.2).					
<b>NOTE</b> : USI Evaluation shall be preceded by USI Identification and Recognition.								
5.7.2	The USI Evaluation shall be completed by personnel that have completed USI Preparer training.							
	5.7.2.1 5.7.2.2	Identifier training.	ng (1) Safety Document Overview training and (2) USI training are prerequisites for completing USI Preparer on 2.5 of this procedure for USI Preparer responsibilities					
			eting USI Evaluation.					
5.7.3 5.7.4	The RSI includes	USI Preparer fills out SNS-OPM-ATT 2.B-10.a. The RSI Documentation Form is divided into three parts. The first part includes information that is important to maintain on the first page of SNS- OPM-ATT 2.B-10.a (Attachment 8.1) and includes the following.						
	5.7.4.1	Document	t number for the USI Evaluation. Section 6, <i>tation</i> , of this procedure contains requirements associated					
	5.7.4.2	with document numbering. Title for the USI Evaluation. The title should provide sufficient description to individualize the USI Evaluation.						
	5.7.4.3	Question and answer that determines the approval authority for the proposed activity or discovered condition and serves as the conclusion of the USI Evaluation.						
		5.7.4.3.1	The USI Evaluation Preparer shall answer yes or no to this question based on the conclusion of the USI Evaluation.					
		5.7.4.3.2	Section 4, <i>Precautions</i> , of this procedure contains instructions if the answer to this question is yes, indicating the need for DOE approval.					
	5.7.4.4	Blank tab	le for required signatures and SME signatures.					
		5.7.4.4.1	The three required signatures for a USI Evaluation are Preparer, Reviewer, and Approver.					
5.7.5			the RSI Documentation Form includes information that is ain on the second page of SNS-OPM-ATT 2.B-10.a					

5.7.5 The second part of the RSI Documentation Form includes information that is important to maintain on the second page of SNS-OPM-ATT 2.B-10.a (Attachment 8.1) and includes the following.

- 5.7.5.1 Executive summary for the USI Evaluation. The executive summary should contain a concise summary of the document including a description of the proposed activity or discovered condition and the overall conclusions of the RSI. The executive summary should note which portion of the SNS is affected, either proton facilities or neutron facilities. It should also indicate whether the USI is a discovered condition or proposed activity.
- 5.7.5.2 Blank space to insert the document number for the USI Identification and Recognition Form that is associated with the USI Evaluation.
- 5.7.5.3 Blank table for RSI Actions. This table should include actions that are deemed necessary to the conclusions of the USI Evaluation. RSI Actions should only be included if the outcome is required to support the conclusion of the USI Evaluation (i.e., not to satisfy other regulatory requirements, delineate expectations that are not pertinent to the safety case, or dictate decisions within the purview of the design process). RSI Actions should be written such that completion of the action is unambiguous and clearly defined.
  - 5.7.5.3.1 All RSI Actions shall be tracked to completion in the ORNL Assessment and Commitment Tracking System (ACTS).
  - 5.7.5.3.2 If the USI Evaluation determines that a proposed activity introduces an accelerator-specific hazard that is not adequately addressed in the current FSADs and approved ASE, then an RSI Action must be included to obtain DOE approval prior to implementation of the proposed activity.
  - 5.7.5.3.3 If the USI Evaluation determines that a discovered condition introduces an accelerator-specific hazard that is not adequately addressed in the current FSADs and approved ASE, then (1) all RSI Actions must be consistent with a response plan approved by DOE, and (2) an RSI Action must be included to obtain DOE approval for resumption of impacted operations once the DOE approved RSI Actions are completed.
- 5.7.5.4 Question and answer addressing whether information presented in the current FSADs is impacted by the proposed activity or discovered condition. If the answer to this question is yes, then the impacted sections and suggested changes to the FSAD should be included in the blank provided.
- 5.7.6 The third part of the RSI Documentation Form is blank space for additional detail (Attachment 8.2). The third part of the RSI Documentation Form is required. At a minimum, the third part of the RSI Documentation Form should include the following.

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- 5.7.6.1 Detailed description of the proposed activity or discovered condition. This description should contain a sufficient level of detail about the proposed activity or discovered condition that a reader familiar with SNS can fully understand it.
- 5.7.6.2 The detailed description should also make it clear to a reader what portions of the proposed activity or discovered condition are a safety concern such that a USI Evaluation is warranted.
- 5.7.6.3 Table 3, USI Evaluation Questions, provides a set of questions that are meant to assist USI Preparers in determining whether the proposed activity or discovered condition introduces accelerator-specific hazards that are not adequately managed by the current FSADs and approved ASE.
  - 5.7.6.3.1 If the answer to any of these questions is yes, then the response to the question on the first page of the USI Evaluation is also yes.
  - 5.7.6.3.2 If any of these questions are pertinent to the proposed activity or discovered condition, they should be addressed in detail to support the conclusion of the RSI.
  - 5.7.6.3.3 Approval of the RSI indicates that all questions from Table 3 have been evaluated and addressed appropriately.
- 5.7.7 USI Preparer sends form to USI Reviewer.

NOTE:						
USI Evaluation shall not be prepared and reviewed by the same person.						
USI Evaluation shall not be prepared and reviewed by the same person.						
5.7.8	USI Reviewer reviews the content in the USI Evaluation. See Section 2.6 of this procedure for USI Reviewer responsibilities.					
5.7.9	USI Reviewer shall have completed USI Reviewer training. Completing (1) Safety Document Overview training, (2) USI Identifier training, and (3) USI Preparer training are prerequisites for completing USI Reviewer training.					
5.7.10	USI Evaluation shall include reviews by appropriate SMEs.					
	<ul> <li>5.7.10.1 SMEs are selected based on their expertise as it relates to the USI Evaluation.</li> <li>5.7.10.2 There is no qualification for SME reviews.</li> </ul>					
	5.7.10.2 There is no qualification for Sivil Teviews.					
5.7.11	If personnel from the Accelerator Safety Program did not prepare or review the USI Evaluation, then at least one person from the Accelerator Safety Program shall be an SME reviewer. A list of Accelerator Safety Program personnel is provided in [7.7].					
5.7.12	Once the RSI Documentation Form is through all reviews, it shall be signed by the USI Preparer, USI Reviewer, and SMEs.					
5.7.13	USI Preparer sends form to SNS Operations Manager or delegate for					

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approval.

- 5.7.14 Once signed by the SNS Operations Manager or delegate, the USI transitions to an RSI.
- 5.7.15 USI Preparer sends the approved form to Accelerator Safety Program personnel for document storage in accordance with Section 6, *Documentation*, of this procedure. A list of Accelerator Safety Program personnel is provided in [7.7].
- 5.7.16 USI Preparer inputs RSI Actions into ACTS, if applicable.

- 1. Could the proposed activity or discovered condition potentially affect:
  - 1.1. The severity of existing accelerator-specific hazards, like:
    - 1.1.1. Access control of the accelerator tunnels or other Personnel Protection System (PPS) controlled areas?
    - 1.1.2. Probability of a significant beam loss event?
    - 1.1.3. Release of cryogenic helium in either the linac tunnel or Central Helium Liquefier (CHL)?
    - 1.1.4. Ability to detect a release of cryogenic helium in either the linac tunnel or CHL?
    - 1.1.5. Release of target mercury outside the service bay?
    - 1.1.6. Release of activated process water?
    - 1.1.7. Total inventory of hydrogen in the Cryogenic Moderator System (CMS)?
  - 1.2. The effectiveness of facility shielding providing personnel protection, like:
    - 1.2.1. Tunnel shielding?
    - 1.2.2. Berm shielding?
    - 1.2.3. Moveable shielding?
  - 1.3. The severity of an accident, like:
    - 1.3.1. Fire?
    - 1.3.2. Explosion?
    - 1.3.3. Loss of confinement of radioactive material?
    - 1.3.4. Vehicle impact?
    - 1.3.5. Load drop from a major crane?
  - 1.4. The severity of an accident by reducing the capability of an existing non-credited hazard control?
  - 1.5. The severity of an accident by introducing a new hazard that requires a new or modified approach to hazard control?
  - 1.6. A Credited Engineered Control (CEC) identified in the approved SNS ASE (except for like-for-like replacements or equivalent)?
  - 1.7. A requirement identified in the approved SNS ASE?
  - 1.8. An action required by the approved SNS ASE that is satisfied by a Credited Administrative Control (CAC)?
- 2. Do you think this proposed activity or discovered condition needs to be considered a potential USI for a reason not identified above (i.e., has the potential to affect safety of personnel, the public, or the environment)?

- 1. Does the proposed activity or discovered condition have the potential to introduce a new or previously unreviewed accelerator-specific hazard?
- 2. Does the proposed activity or discovered condition have the potential to significantly affect the magnitude of an existing accelerator-specific hazard, including the magnitude of a release, or the affected locations?
- 3. Does the proposed activity or discovered condition have the potential to exceed a bounding condition of the approved SNS ASE?
- 4. Does the proposed activity or discovered condition have the potential to affect how a CEC accomplishes its safety function, including method, scope, reliability, and potential failures?
- 5. Does the proposed activity or discovered condition have the potential to significantly affect the credited implementation of a CAC?
- 6. Does the proposed activity or discovered condition merit a USI evaluation outside of the above questions?

# **Table 3: USI Evaluation Questions**

- 1. Does the proposed activity or discovered condition affect the magnitude of an existing accelerator-specific hazard, including the magnitude of a release or the affected areas from the release?
- 2. Does the proposed activity or discovered condition introduce a new or previously unreviewed accelerator-specific hazard?
- 3. Does the proposed activity or discovered condition require a change to the approved SNS ASE?
- 4. Does the proposed activity or discovered condition impact the credited implementation of a CAC?
- 5. Does the proposed activity or discovered condition introduce risks that merit DOE approval?

#### 6. <u>Documentation</u>

- 6.1 The Accelerator Safety Program will maintain all completed and signed USI Identification and Recognition Forms as records in ORNL Enterprise Document and Record Management System (EDRM) using the document number series 102030107-ESH10###-R##.
- 6.2 The Accelerator Safety Program will maintain all completed and signed RSI Documentation Forms as records in ORNL EDRM using the document series 102030108-ESH10###-R##.
- 6.3 All RSIs shall be considered an appendix to the appropriate FSAD until such time they are incorporated into the appropriate FSAD.

### 7. <u>References</u>

- 7.1 Spallation Neutron Source Final Safety Assessment Document for Proton Facilities, 102030103-ES0018
   <u>https://ns-staff.ornl.gov/operations/SNS-OPM/FSAD\_PF.pdf</u>
- 7.2 Spallation Neutron Source Final Safety Assessment Document for Neutron Facilities, 102030102-ES0016 <u>https://ns-staff.ornl.gov/operations/SNS-OPM/FSAD\_NF.pdf</u>
- 7.3 Spallation Neutron Source Accelerator Safety Envelope, 102030103-ES0016 https://ns-staff.ornl.gov/operations/SNS-OPM/SNS-ASE.pdf
- 7.4 Safety of Accelerators, DOE O 420.2D <u>https://www.directives.doe.gov/directives-documents/400-series/0420.2-BOrder-d/@@images/file</u>
- 7.5 ORNL SBMS Accelerator Safety Management System https://sbms.ornl.gov/sbms/SBMSearch/MSD/ASM/ASM\_MSD.cfm
- 7.6 Neutron Sciences Directorate Policy on Configuration Management, 80000000-CMT10002 <u>https://edrm.ornl.gov/federaldox/#/irl/0902f41f8046cff2?dataSourceId=ORNL\_PRD</u> <u>&versionLabel=CURRENT</u>
- 7.7 ORNL SBMS Support Services Directory for Accelerator Safety Program https://sbms.ornl.gov/sbms/SupportServices.cfm?SS=Accelerator%20Safety

#### 8. <u>Attachments</u>

8.1 SNS-OPM-ATT 2.B-10.a Reviewed Safety Issue Documentation Form – PDF https://ns-staff.ornl.gov/operations/SNS-OPM/02-B-10-a.pdf

- 8.2 SNS-OPM-ATT 2.B-10.a Reviewed Safety Issue Documentation Form (extra pages) – Microsoft Word <u>https://ns-staff.ornl.gov/operations/SNS-OPM/02-B-10-a.docx</u>
- 8.3 SNS-OPM-ATT 2.B-10.b Unreviewed Safety Issue Identification and Recognition Form – PDF https://ns-staff.ornl.gov/operations/SNS-OPM/02-B-10-b.pdf

#### 9. <u>Revision History</u>

- Rev. 00 October 25, 2002 Original version.
  - SNS-OPM-ATT 2.B-10.a Rev. 00 October 25, 2002 Original version.
- Rev. 01 January 5, 2006 Changed title of procedure. Updated signature page to reflect job title changes and add additional signers. Extensive updates to Sections 1 through 7. Removed Section 9, Flow Chart.
  - SNS-OPM-ATT 2.B-10.a Rev. 01 January 5, 2006 Extensive updates to content of form.
- Rev. 02 March 12, 2007 Updated signature page to reflect job title changes. Updated responsibilities in Section 2.3. Updated steps 5.2.2, 5.3, 5.5, 5.6, 5.7, 6.1. Updated links in references in Section 7.
  - SNS-OPM-ATT 2.B-10.a Rev. 02 March 12, 2007 Updated signature page to reflect job title changes.
- Rev. 03 July 30, 2012 Changed title of procedure. Updated signature page to reflect job title changes and remove signers. Updated references from DOE O 420.2B to 420.2C. Updated step 1.1 and Section 2. Updated Section 3 to include qualified preparer and qualified reviewer training and qualification requirement. Changed references from USID to USIE throughout. Extensive updates to Section 5. Updated links in references in Section 7.
  - SNS-OPM-ATT 2.B-10.a Rev. 03 July 30, 2012 Changed title of form. Updated signature page to reflect job title changes and remove signers. Changed references from USID to USIE throughout. Changes references in six questions from authorization basis to FSADs. Removed seventh question. Updated approvals.
- Rev. 03.1 April 28, 2016 Triennial Procedure Review. Updated signature page to reflect job title changes. Updated links in Sections 7.3, 7.4, and 7.5. Added Section 9, Revision History.
  - SNS-OPM-ATT 2.B-10.a Rev. 03.1 April 28, 2016 Triennial review. Updated signature page to reflect job title changes.

- Rev. 04 October 1, 2019 Triennial Procedure Review. Editorial and clarification changes throughout. Eliminated obsolete positions and titles. Updated signature page to reflect job title changes. Incorporated HPC 2018-9, which is the Microsoft Word version of the pdf, which makes it more useful for a user to work on a USI Evaluation. Section 7 added link to the SNS Occurrence Reporting Procedure.
  - SNS-OPM-ATT 2.B-10.a Rev. 04 October 1, 2019 Triennial review. Updated signature page to reflect job title changes. Added SNS Document numbering format in the header starting on page 2 to help prompt the author, since a document number is assigned to each completed USIE.
- Rev. 05 October 18, 2024 Update for compliance with DOE O 420.2D [7.4] and ORNL SBMS *Unreviewed Safety Issue (USI) Process Description* mandatory exhibit (DOE approved). Complete rewrite of entire procedure. Added new attachment, SNS-OPM-ATT 2.B-10.b.
  - SNS-OPM-ATT 2.B-10.a Rev. 05 October 18, 2024 Complete rewrite of entire form.
  - SNS-OPM-ATT 2.B-10.b Rev. 00, October 18, 2024 Original version.
- Rev. 05.1 February 14, 2025 Minor revision to incorporate best practices and editorials found during training development and revision. Aligned the three roles in the procedure with training and differentiated between roles and steps of the procedure the roles are performing. Updated prerequisites to align with training. Gave the Accelerator Safety Program the responsibility to insert basic document information in USI Identification and Recognition form prior to sending it to USI Preparer. Update wording to include potential yes responses to questions in Tables 1 and 2. Removed step of procedure discussing ASE impacts in RSI Documentation form (commensurate with change to form). Updated erroneous step numbering in procedure. Fixed a typo in Tables 2 and 3.
  - SNS-OPM-ATT 2.B-10.a Rev. 05.1 February 14, 2025 Removed section of form for ASE impacts on page 3 and increased the size of block for FSAD impacts.
  - SNS-OPM-ATT 2.B-10.b Rev. 00.1, February 14, 2025 Moved the basic document information (title, document number, and check boxes for proposed activity or discovered condition) to the top of the USI Recognition section. Removed italicized information below question for yes response.