

TEMPORARY CHANGE REQUEST

TCR NO. **TCR-P-080, R2-002**

(e.g., TCR-ENG-021,R0-001)

The Temporary Change Request (TCR) Form is to be used to process urgent or minor changes for PPPL Policies, Organization/Mission Statements and Procedures. The TCR should be used when changes are:
1) urgent, and can not wait the 2-4 week period for Department Head review/comment, or
2) minor, and do not warrant Department Head review.

Person Requesting Change: Jerry Levine Phone Ext: 3439

Department Name: ES&H

Document Number: P-080 Revision No.: 2

Document Title: Variances to ES&H Regulations

Reason for change:

Organizational changes, added the Management system, training and records sections, and a title change to one referenced document.

Change description: (Summarize and attach changed pages, with changes clearly indicated)

ESH&S Department changed to ES&H, DOE Office of Environment, Health, Safety and Security (EHSS) clarified (added "Environment" to current title), added the Management system, training and records sections, and current title of PPPL Policy P-001 noted. See attached.

1. Does this TCR significantly alter the intent or scope of the document? YES: NO: X

2. Does this TCR significantly impact ES&H? YES: NO: X

If 1 or 2 is YES, Explain why the changes should not be routed for Department Head review:

Jerry Levine
Department/Division Head Approval

7/11/16
Date

John DeLooper
Head, Best Practices and Outreach/designee

7/12/16
Date

Release/Effective date of this TCR: 7/12/16

Incorporate this TCR into next revision of this document? YES: X NO:

PPPL	PRINCETON PLASMA PHYSICS LABORATORY	POLICY		No. P-080 Rev 2 page 1 of 2
		Subject: Variances to ES&H Regulations	Effective Date: June 19, 2007	Initiated by: Head, ES&H
		Supersedes: Rev. 1 4/22/98	Approved: Director	

TCR-P-080, R2-002

Management System (Primary): 09.00 ESH and Integrated Safety Management (ESH)
Management System Owner: Head, ES&H Department
Management Process: 09.01 ES&H - Environment, Safety and Health Management
Process Owner: Head, ES&H Department
Sub-Process: 09.01.01 Integrated Safety Management System (ISMS)
Sub-Process Owner: Head, ES&H Department
Subject Matter Experts (SMEs): Head, ES&H Department

It is PPPL policy that Laboratory personnel, visitors, and on-site subcontractors comply with applicable federal, state, local, and University ES&H regulations. In cases where compliance cannot be achieved due to particular circumstances, a variance to the applicable regulation shall be requested by the Responsible Line Manager (RLM). Variances shall be directed to the Environment, Safety & Health (ES&H) Department Head.

If the requested variance involves an exception to compliance with some part of a safety and health standard or requirement in the DOE-approved PPPL Worker Safety and Health Program (which describes the Laboratory's compliance with the pertinent requirements of 10 CFR 851), the variance request will be prepared and processed in accordance with Subpart D of 10 CFR 851. The ES&H Department Head will submit the request through the DOE Princeton Site Office (PSO) to the DOE Office of Science (SC), to the DOE Office of Environment, Health, Safety and Security (EHSS), and to the DOE Under Secretary for approval. During the period that the variance request is being processed, no work can take place that is not in compliance with the standard or requirement that is the subject of the variance.

For variance requests that do not involve the DOE-approved PPPL Worker Safety and Health Program pursuant to 10 CFR 851, the ES&H Department Head (or designee) will apply the appropriate graded approach to the variance request and take into consideration such factors as:

- the level of risk presented and whether work activities can be conducted in a manner to assure an acceptable level of safety;
- alternative measures that could be employed so as to reduce the risk of bodily injury/property damage;
- analysis of potential failure modes (and consequences).

If the ES&H Department Head (or designee) concurs with/endorse a variance request that is not associated with the DOE-approved PPPL Worker Safety and Health Program, a petition letter will be sent to DOE-PSO. A copy of this letter will also be sent to the RLM that originally requested the variance. The petition letter will formally request that DOE-PSO grant a variance to the

requirement in question and provide justification. During the period before a response from DOE-PSO is received, the ES&H Department Head will render a decision to either allow or prohibit the continuance of the work for which the variance was requested. This decision will be documented by the ES&H Department.

Training (Section Required for All Procedures)

ES&H Department
Head

A. Target Audience: All RLM's and Department Heads

Instructor: ES&H Department Head

Training Method:

Read only

Email distribution only

Frequency:

Once only

Records Requirements Specific To This Procedure

Records Custodians must assure records are maintained as follows:

Record Title	Record Custodian	Location	Retention Time
10 CFR 851 Variance Request	ES&H Department	ES&H Department	Destroy 5 yrs after petition/waiver expires. <i>Reference Environmental Records (3.c)</i> <i>Hold Indefinitely</i>

The ES&H Department shall be responsible for maintaining all correspondence relating to variances.

References

- P-001 Graded Approach to Work Planning and Control
- P-003 Environment, Health, and Safety Policy
- P-039 Hazard Analysis and Controls
- P-048 Safety Analysis and Review System Program
- PPPL Worker Safety and Health Program
- 10 CFR 851 Worker Safety and Health Program