

Document Development for Environmental Deliverables

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Hazard Class: Low Moderate High/Complex
Usage Mode: Reference UET Both UET & Reference

The Responsible Manager has determined that the following organizations' review is required for initial procedure release as well as subsequent major revisions. Review documentation is contained in the Document History File.

Program Director
 Program Manager
 Quality Assurance

Classification Review: Unclassified UCNI Classified

Sandra Martinez /106229 //s/ Sandra Martinez / 2/21/2017

Name (print) Z# Signature Date

Responsible Manager, Division and Title

Bruce Robinson /092781 //s/ Bruce Robinson / 2/21/2017

Name (print) Z# Signature Date

REVISION HISTORY

Document No./Revision No.	Issue Date	Action	Description
EP-DIR-AP-10020, R0	2/6/14	New Procedure	<p>This procedure supersedes SOP-4006, Document Development and Deliverables Compliance Process.</p> <p>This procedure defines the process for the development of documents generated by Environmental Programs Directorate organizations.</p> <p>Removed three attachments and incorporated the content into the body of the procedure.</p> <p>Added information on DOE's participation in the decision peer review process; processing communication record forms; tracking deliverables; and determining documents that are not sent to the Electronic Public Reading Room.</p>
EM-AP-10087, R0	2/22/2017	New Procedure	<p>This procedure was cancelled in the ADEM system and is being reissued as a new procedure with a new number.</p>

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
TITLE PAGE.....	1
REVISION HISTORY	2
TABLE OF CONTENTS	3
1. PURPOSE.....	4
2. SCOPE.....	4
3. PRECAUTIONS.....	4
4. PREREQUISITE ACTIONS	6
5. RESPONSIBILITIES	6
5.1 Author/Designee.....	6
5.2 Deliverables Compliance Manager.....	7
5.3 Author.....	8
6. PERFORMANCE.....	8
6.1 Preparing Drafts for Review	8
6.2 Preparing Documents That May Require ONLY Peer Review	11
6.3 Review Process.....	12
6.4 Using the Accelerated Approach.....	12
6.5 Preparing the Submittal Letter.....	13
6.6 Preparing the Final Document	13
6.7 Signature Process.....	14
6.8 Submittal of Final Document	15
6.9 Distribution and Archiving	16
7. RECORDS.....	17
8. REFERENCES	17
9. ATTACHMENTS	17
 <u>Attachments</u>	
Attachment 1, Document Development and Regulatory Compliance Process Flow Chart	18
Attachment 2, Document Services Request Form.....	19

1. PURPOSE

This procedure describes the process for producing documents prepared by the Los Alamos National Laboratory (LANL or the Laboratory) Associate Directorate for Environmental Management (ADEM) and other LANL organizations when requested. Documents include regulatory reports and correspondence, as well as technical reports, posters, presentations, and procedures, to the New Mexico Environment Department (NMED), the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and local and tribal governments.

2. SCOPE

This process guides staff in planning, scheduling, tracking, developing, editing, formatting, reviewing, signing, producing, submitting, and distributing documents. A flow chart of the process is included as Attachment 1.

3. PRECAUTIONS

The author/designee is ultimately responsible for the document's quality and schedule and for getting required approvals; however, a designee of the author may take on some of the document responsibilities. The author/designee and the deliverables compliance manager must work together to complete the process.

- One type of peer review, the decision peer review, must be conducted before document preparation or at a key decision phase. DOE representatives must be included in the decision peer review for documents that will be submitted to NMED, EPA, or DOE to ensure their input is captured and documented in a final summary and sent out to all participants.
- In the formal peer review, the 95% draft of the document is used. See EM-AP-10088, Peer Review of Environmental Documents, and note that formal peer review is generally coordinated by the deliverables compliance manager.
- Per EM-AP-10089, Formalizing Regulatory Communications, communication records are processed through the deliverables compliance team because the information therein may affect regulatory due dates, commitments, submittals, and project scope or trigger new commitments to regulators.

3. PRECAUTIONS (continued)

- The online Review & Approval System for Scientific and Technical Information (RASSTI) may take less than a day to assign a Los Alamos Unlimited Release (LA-UR) number; however, the responsible line manager must approve the request for the LA-UR number before the deliverables compliance manager receives the assigned number from SAFE-1.
- NMED must agree with outlines that vary from those prescribed in the Compliance Order on Consent (Consent Order), available at <https://www.env.nm.gov/HWB/lanlperm.html#June2016CO>.
- A certification page and an engineering stamp are required for remedy completion reports and closure reports submitted to NMED. For documents prepared under the EPA Individual Permit for Storm Water (IP), certification statements are required for documents prepared to meet the requirements of the IP.
- A document due on the weekend or on a holiday Monday is due to the regulator on the Friday before. The author/designee must identify whether the document must be delivered to external parties (e.g., local governments, EPA) at the same time it is delivered to the administrative authority and/or regulator.
- The assignment of the document catalog number (EP201x-xxxx) by the deliverables compliance manager to documents prepared by ADEM initiates the document development process. ESHID numbers (formerly ERID) signify the end of the document process and are issued during records submittal.

4. PREREQUISITE ACTIONS

Use this procedure as a checklist and use the following tools for document development, available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.

- Document services request form (Attachment 2)
- Signature/approval form (generated when an EP document catalog number is assigned)
- EP-DIR-DI-10065, Requirements for Map Layout and Design (under revision)
- 2017 Editing and Compositing Guidelines
- Writing resources
 - Checklists
 - Templates
 - Acronyms and abbreviations list
 - List of references with ERIDs/ESHIDs
 - Technical area descriptions

5. RESPONSIBILITIES

5.1 Author/Designee

- Determines the document type and assesses available information to develop the document, such as historical information that can be found by searching the Potential Release Site Website, previous submittals to NMED or any other administrative authority, Consent Order and IP requirements, and/or data or maps.
- Gives the deliverables compliance manager adequate notice (at least 1 month depending upon document size and due date), and fills out the online document services request form (Attachment 2) for all document-related requests. If a document does not require editing or compositing, see section 6.2.
The document services request form is available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>
- Meets with subject matter experts, deliverables compliance manager, editor, compositor, and subcontractor to (1) set a realistic schedule to complete the document by the specified time; (2) determine the resources needed (e.g., geographic information system [GIS], data, illustration); and (3) estimate the time required to complete the document before the due date.

5.1 Author/Designee (continued)

- Develops a schedule that includes deadlines for writing assignments, reviews, comment incorporation, final draft submission, final editing and composition, and signatures. Emails schedule to staff working on the document. Communicates any changes in document logistics to the deliverables compliance manager.
- Asks the deliverables compliance manager for an earlier version, template(s), or sample of a specific document to follow, or update.
- Consults with the data and GIS teams about data and map/figure requirements and requests the GIS specialist prepare new maps, as necessary. Requests the necessary data for the document from the data steward. The data may also be requested by the subcontractor. Note: Documents with maps must include map data sources as part of the reference section.
- Schedules a decision peer review per procedure EM-AP-10088, Peer Review of Environmental Documents. DOE counterparts must be included in the decision peer review, the formal peer review, and any key decision phases.

5.2 Deliverables Compliance Manager

NOTE *The deliverables tracking database, Correspondence Control and Action Tracking (CCATs), is the official database for tracking deliverables to a regulatory authority.*

- Assigns document catalog numbers. This number is unique to ADEM and signifies the start of the document process.
- Assigns document catalog number to the submittal letter and to an individual document deliverable. Multiple documents of the same type will each have a document number and an LA-UR number (e.g., periodic monitoring reports or IP certifications of completion).
- Assigns editor and compositor resources to the document and gives each a copy of the document services request form.
- Adds document(s) to the deliverables compliance schedule. This schedule is maintained by the deliverables compliance manager and tracks new and known deliverables, including notifications, deliverables completed, due dates, signature dates, completion dates, and metadata on staff resources, peer review, LA-UR number, and EP and ERID/ESHID numbers.
- Obtains LA-UR numbers, delivers documents to regulatory authorities and customers, and distributes final documents.

5.3 **Program Manager/Author**

NOTE *Authors must obtain written approval to use copyrighted material. Referenced materials cited in documents that are not already in the Master Reference Set, including books, must be provided to NMED. Authors can contact the deliverables compliance manager who will coordinate with the LANL Research Library to verify the appropriate copyright use for journal articles, books, or other referenced materials. Authors can also contact the deliverables compliance manager to obtain ESHIDs used to reference works cited in documents.*

- Coordinates resources and obtains templates and previous versions to produce 95% draft.
- Must follow Laboratory and DOE publication policies and must contact the deliverables compliance manager if questions arise.
- Ensures the schedule is followed and adjusted as necessary and reports progress and any issues that may arise to the author/designee and the deliverables compliance manager.

6. **PERFORMANCE**

6.1 **Preparing Drafts for Review**

Author/Designee

- [1] **DETERMINE** the subject matter experts to draft the document.
- [2] **ASSIGN** sections and due dates to subject matter experts if more than one author is working on the document.
- [3] **REVIEW** completed sections and **PROVIDE** feedback to the author(s) or subcontractor.
- [4] **RECEIVE** 95% completed peer review draft from the in-house authors or subcontractor.

NOTE *Subcontractor staff preparing the draft for peer review must use current templates, follow the 2017 Editing and Compositing Guidelines, and use the tools listed in section 3.*

Existing templates are available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.

6.1 Preparing Drafts for Review (continued)

- [5] **COORDINATE** file transfer with the deliverables compliance manager, editor, and the compositor.

NOTE *These files are now the master files, and any changes must be coordinated through the assigned compositor or editor.*

- [6] **SUBMIT** electronic Microsoft Word files of the document, including tables and figures; **SUBMIT** source files for maps (i.e., Adobe Illustrator or Acrobat) for archiving; and **SUBMIT** any other files needed for delivery to the administrative authority (e.g., data files).
- [7] **REQUEST** the reporting data set from the data steward per ER-SOP-20145, Requesting and Managing Data Sets.
- [8] **REQUEST** base maps from a GIS specialist.
- [9] **ENSURE** that the assigned data steward has provided the final data set and that the GIS specialist validates the spatial data.

Compositor

- [10] **SET UP** electronic folders and **DISCUSS** document particulars with editor.

Editor and/or Subcontractor

- [11] **EDIT** before peer review if the author/designee requests and if time permits; **RESOLVE** queries and **REVIEW** editorial changes with the author/designee, and **INFORM** the compositor when edited pieces are ready to format.
- [12] **USE** the 2017 Editing and Compositing Guidelines and editing checklist available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>

6.1 Preparing Drafts for Review (continued)

Composer and/or Subcontractor

NOTE *For large documents, the subcontractor must deliver a CD with a copy of the document to the deliverables compliance manager and the subcontractor technical representative (STR). LANL File Transfer is also available to upload a large document for internal and external reviewers.*

[13] **COMPILE** and **FORMAT** the peer review draft according to the ADEM guidelines and composition checklist, available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.

[14] **INFORM** the deliverables compliance manager when the file(s) are ready for peer review.

Deliverables Compliance Manager

[15] **COMPLETE** the online Technical Information Release (TIR) form and **SUBMIT** for signature/review process via the online RASSTI.

NOTE 1 *The online RASSTI process is available at <https://weblogin.lanl.gov/login.php?referer=http://review.lanl.gov/>. Designated Unclassified Subject Areas (DUSAs) are defined areas of Laboratory work that are in potentially classified subject areas but are known neither to use nor to generate classified information and are, as defined, unclassified. Authors/designees are responsible for determining the type of DUSA appropriate for the document.*

NOTE 2 *Authors/designees request, and indicate on the document services request form, whether the document needs an LA-UR number. LA-UR numbers are required for all documents, including attachments to letters, intended for external distribution.*

[16] **OBTAIN** review by derivative classifier (DC). (See list of DC reviewers at <http://int.lanl.gov/security/safeguards/information-protection/dc.shtml>.)

6.1 Preparing Drafts for Review (continued)

NOTE 1 *Using RASSTI may take a day or two, depending on how quickly the Responsible Line Manager approves the request.*

NOTE 2 *Laboratory classification emails the LA-UR number to individual who initiated the online DUSA request as well as the Responsible Line Manager.*

[17] **ENTER** the LA-UR number in CCATs.

6.2 Preparing Documents That May Require ONLY Peer Review

Examples of documents that are peer reviewed, but not edited and composited, include waste characterization strategy forms, maps, drawings, statements of work, and safety and security plans and reports.

Author/Designee

[1] **COMPLETE** the document services request form and **REQUEST** peer review only.

Deliverables Compliance Manager

[2] **ASSIGN** a document catalog number.

[3] **EMAIL** the document catalog signature form to the requestor.

[4] **COORDINATE** the peer review.

Author/Designee

[5] **ALLOW** appropriate time for review and reconciling and incorporating comments.

NOTE *For documents with their own signature pages, the document catalog signature form will indicate “approval signatures on final document.”*

[6] **FINALIZE** the document and **OBTAIN** required signatures on title page of document, as appropriate.

[7] **PRINT** a copy of the document catalog signature form.

[8] **ATTACH** the document catalog signature form to the final document and **EMAIL** complete document to deliverables compliance manager.

6.3 Review Process

NOTE *Most documents go through the peer review and comment resolution process. The length of this review process depends on the length and complexity of the document. Allow at least 2 weeks for final editing and composition and for obtaining signatures.*

- [1] **REQUEST** peer review on the document services request form in accordance with EM-AP-10088, Peer Review of Environmental Documents.
- [2] **RETURN** the document to the editor for final editing after peer review comments have been addressed and incorporated.
- [3] **RETURN** completed, signed peer review comment forms to the deliverables compliance manager.

6.4 Using the Accelerated Approach

Documents that have a shorter schedule for completion follow the accelerated approach. Some examples include 30- and 45-day responses to the regulator and revisions, including approvals with modifications and/or direction and replacement pages for previously published documents.

Author/Designee

- [1] **SUBMIT** a document services request form indicating the need for a modified peer review (shorter review time and fewer reviewers) for a document going through the accelerated process.

Deliverables Compliance Manager

NOTE 1 *For major changes, such as revisions, the document is reissued in its entirety as a "Revision 1" because the content has changed significantly.*

NOTE 2 *For minor changes, such as replacement pages, correcting grammar or spelling; renumbering sections, pages, or attachments; or changes that do not affect content, the document does not require the same level of review and approval as the original.*

- [2] **REQUEST** a new classification review to obtain an LA-UR number; **SUBMIT** the document for a modified peer review with regulatory compliance, legal, RCRA (waste), and DOE.

6.5 Preparing the Submittal Letter

Deliverables Compliance Manager

- [1] **EMAIL** the draft submittal letter to the author/designee to modify content and to update the standard distribution list, as appropriate.

Author/Designee

- [2] **REVIEW** the draft letter and **INCLUDE** any relevant information regarding the document, including adding to the standard distribution list, indicating whether additional hard copies must be produced and indicating if the document proposes future/additional scope or documents.
- [3] **SUBMIT** the final draft submittal letter to the deliverables compliance manager to finalize and prepare the blue folder.

6.6 Preparing the Final Document

Editor

- [1] **RECEIVE** final draft of document for editing from the author/designee or designee.

NOTE *Subcontractors preparing documents must use current templates and checklists and follow the 2017 Editing and Composition Guidelines.*

- [2] **PERFORM** a full edit and **REVIEW** editorial changes and **RESOLVE** any queries with the author/designee.

Compositor

- [3] **RECEIVE** final edited draft of document from the editor for final composition.

NOTE *The final document checklist is available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.*

- [4] **PRINT** a final review copy of the document, **ASSEMBLE** a complete document (including CD/DVD labels and plates), and **PROVIDE** the document to an editor or compositor not assigned to the document to perform a final document check using the in-house checklist.

6.6 Preparing the Final Document (continued)

[5] **MAKE** any corrections based on the final document check and **REPRINT** pages or entire document depending the extent of the changes.

[6] **PRODUCE** final document for author/designee to approve.

Author/Designee

[7] **REVIEW** final and may make additional changes, **APPROVE** by signing the final document checklist indicating the document is complete and ready for production.

6.7 Signature Process

Deliverables Compliance Manager

NOTE 1 *The signature process at ADEM may take 1–2 days. DOE requires a mandatory 5 days to review and sign. At DOE, the signature sign-in sheet must be completed to record when the document was dropped off and picked up to ensure deadlines are met. Some managers have Entrust software allowing them to use “signed and validated” digital signature.*

NOTE 2 *DOE often “reviews” the document during the 5-day review and signature timeframe and significant changes may occur.*

NOTE 3 *The document catalog signature form lists reviewers/approvers who sign vouching that the document(s) meets technical, programmatic, and regulatory requirements. Reviewers include the author, technical specialist, project manager, and program director.*

[1] **ASSEMBLE** blue folder with the submittal letter, document(s), and the document catalog signature form. If applicable, certification page, engineering certification, and Form 1824.

Compositor

NOTE 1 *For Consent Order deliverables, prepare two copies for NMED, one copy for DOE, and one copy for the author/designee at the time of the NMED delivery. The remaining distribution can be completed the next day.*

NOTE 2 *For DOE, EPA, or other non–regulatory deliverables, prepare one hard copy with electronic files unless otherwise noted on the distribution list or document services request form.*

[2] **PRODUCE** final copies.

6.8 Submittal of Final Document

Deliverables Compliance Manager

- [1] **ENSURE** documents are delivered as follows, and confirmation of delivery is documented via a date/time stamp.
- Documents hand-delivered to NMED must be in the form of two hard copies with accompanying CDs/DVDs and the original submittal letter. Correspondence without attachments is hand-delivered in the form of one hard copy. NMED date stamps a copy of the submittal letter to verify the document was received before or on the due date.
 - Documents delivered to DOE must be in the form of two hard copies with accompanying CDs/DVDs and the original submittal letter. DOE date stamps a copy of the submittal letter to verify the document was received before or on the due date.
 - Documents are delivered to the EPA via U.S. certified mail in the form of one hard copy with accompanying CD/DVD. The LANL mailroom date stamps a copy of the submittal letter to verify the document was mailed before or on the due date. The domestic return receipt card is filled out and the box checked for certified mail. This green card is sent back to the deliverables compliance manager and verifies that the document was received. The card is scanned and archived in the respective document folder.

NOTE *Documents must be taken to the LANL mailroom before 2:00 pm.*

- Documents for local and tribal governments are emailed, and originals are hand-delivered or sent via U.S. mail, as appropriate. If hand-delivered or sent via U.S. mail, a copy of the submittal letter serves as the date stamp to verify delivery.
- [2] **ARCHIVE** the electronic copy of the date-stamped letter in the NMED Submittals_ Letters folder on P:drive.

6.9 Distribution and Archiving

For any document, the compositor completes the distribution indicated on the submittal letter. This distribution includes any additional paper copies and submittal to Records, Electronic Public Reading Room (EPRR), Hard Copy Public Reading Room (HPRR), and local governments.

NOTE 1 *Distribution is time sensitive and must be completed immediately (the next day) and electronically to accommodate the EPRR upload, which may take 2 days.*

NOTE 2 *The following documents are not submitted to the EPRR or HPRR: air-monitoring reports, spill responses, access agreements, communication records, contract deliverables to DOE, and internal project plans and reports.*

NOTE 3 *The distribution checklist is available at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.*

Compositor

[1] **ENSURE** all final document files are in the document folder.

Document Manager or Designee

[2] **DISTRIBUTE** documents according to the distribution list in the submittal letter, and **FOLLOW** the distribution checklist.

[3] **SCAN** and **ARCHIVE** all relevant document particulars in the appropriate document folder.

7. RECORDS

Records generated by this procedure will be submitted to the designated point of contact for document management in accordance with P1020-1, Laboratory Records Management; EP-AP-10003, Records Management; and ADESH-AP-006, Records Management Plan.

Document Manager/Designee

- [1] **SUBMIT** final records and/or documents to Records and **INCLUDE** transmittal to the HPRR/EPRR as applicable.

- [2] **ENSURE** air-monitoring reports, spill responses, access agreements, communication records, and internal project plans and reports are NOT submitted to the EPRR or HPRR.

8. REFERENCES

EP-DIR-DI-10065, Requirements for Map Layout and Design

P1020-1, Laboratory Records Management

EP-AP-10003, Records Management

ADESH-AP-006, Records Management Plan

EM-AP-10088, Peer Review of Environmental Documents

EM-AP-10089, Formalizing Regulatory Communications

ER-SOP-20145, Requesting and Managing Data Sets

9. ATTACHMENTS

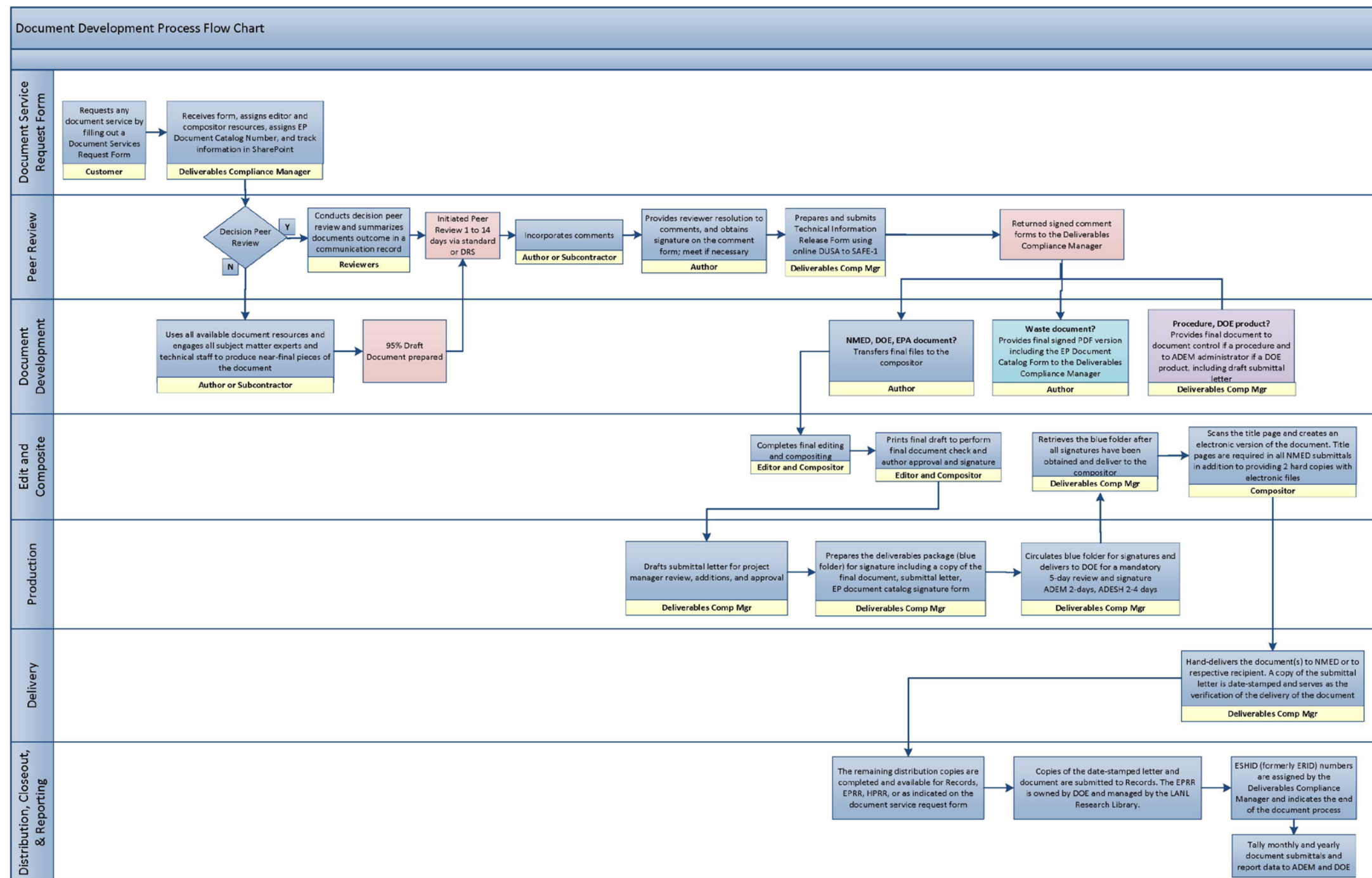
Attachment 1, Document Development Process Flow Chart

Attachment 2, Document Services Request Form

ATTACHMENT 1

Page 1 of 1

Document Development and Regulatory Compliance Process Flow Chart



ATTACHMENT 2

Page 1 of 1

Document Services Request Form

SUBMIT FORM

Document Services Request Form

Request Date: Project Manager/Phone/Email:

Author/Subcontractor/Phone/Email:

Document Title: *(must be the same as referenced in the NMED letter)*

Cost Codes:

Due to ADESH:
(as appropriate)

Due to Regulator/Customer:

Due to DOE:

Service(s) Requested:

Classification Status:

<input type="checkbox"/> Peer Review	<input type="checkbox"/> Standard	<input type="checkbox"/> Document Review Service	<input type="checkbox"/> DUSA	<input type="checkbox"/> Business Sensitive
<input type="checkbox"/> Writer/Editor	<input type="checkbox"/> Production	<input type="checkbox"/> Illustrator	<input type="checkbox"/> Full Review	
<input type="checkbox"/> Compositor	<input type="checkbox"/> Photos, Viewgraphs, Posters, Courier			

Date for decision peer review:

Date to submit to peer review:

Comments due:

Reviewers: *(must include data, DOE, GIS, Legal, RCRA, regulatory, risk, technical)*

Document Size:

Small Medium Large Plates: Yes No How many: _____

Distribution/Other Requirements: *(specify distribution requirements in comment box below)*

Brief summary of request *(include request for extra copies):*

Additional Deliverable

Does this deliverable initiate other deliverables? If yes, please indicate title and due date.

To be filled out by Document Manager only

Editor: _____	PR Request: Y/N	ADEM Letter No.: _____
Compositor: _____		ADESH Letter No.: _____
EP No.: _____	LA-UR No.: _____	
EP No.: _____	LA-UR No.: _____	