

Peer Review of Environmental Documents

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Hazard Class: Low Moderate High/Complex
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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

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REVISION HISTORY

Document No./Revision No.	Issue Date	Action	Description
EP-DIR-AP-10070, R0	6/13/2013	New procedure	<p>This procedure supersedes SOP-4005. This procedure defines the process for review of documents generated by Environmental Programs Directorate organizations.</p> <p>Updated title and procedure number; added specific instructions for decision reviews; and tied this procedure to the communication record procedure. Incorporated DOE findings in its analysis of the EP FY2013 Peer Review and Support Documents.</p>
EM-AP-10088, R0	12/21/2016	New procedure	<p>This procedure was cancelled in the ADEM system and is being reissued as a new procedure with a new number. Major changes include clarifying the length of the peer reviews and incorporating the relationship of communication records to the decision peer review process.</p>
EM-AP-10088, R1		Major Revision	<p>Revised Attachment 2, Review, Approval, and Signature Matrix.</p>

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1. PURPOSE

This procedure describes the process for reviewing documents prepared by the Los Alamos National Laboratory (LANL or the Laboratory) Associate Directorate for Environmental Management (ADEM), including regulatory documents submitted to the New Mexico Environment Department (NMED), U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and local and tribal governments.

This process (see Attachment 1) guides staff in conducting peer reviews and identifying review requirements and reviewer responsibilities. The review process also ensures that management is in alignment with key decisions, such as readiness for work or submittal of critical documents. Reviews are performed by qualified technical personnel with sufficient independence to ensure that criteria, assumptions, methodology, and conclusions are appropriate for a given document.

The process also ties in to EM-AP-10089, Formalizing Regulatory Communications, to document significant communications among LANL staff and between LANL and regulatory agency personnel. Communications may include face-to-face meetings, telephone calls, and email that capture regulatory issues affecting compliance with regulatory permits.

2. SCOPE

There are two types of reviews: Decision and Document.

Decision—A mandatory review for all regulatory deliverables that occurs before document writing has begun and that focuses on the appropriateness of the stated objectives for any problems or issues identified; the proposed approach to address the objectives; important assumptions; deliverable milestones; and any risks, issues, and contingencies. The data analysis is also presented during this review. This review requires subject matter experts (SMEs) from Geographic Information System (GIS), legal, data, DOE, regulatory compliance, and technical reviewers to participate. Attachment 2 provides appropriate SMEs for the review process.

Document—A review of a 95% complete draft of a document that focuses on clarity of presentation and approach and on consistent, appropriate format and content.

The review draft usually receives a pre-review edit and composite. This draft includes all pertinent sections for a formal review and indicates “Peer Review Draft” on the document cover.

2. SCOPE (continued)

Reviewers are given up to 5 working days to review and comment on smaller documents (i.e., fewer than 15 pages of text) and at least 10 working days to review and comment on larger, more complex documents (i.e., more than 15 pages of text). Documents on an accelerated schedule may require a shorter review period and fewer reviewers.

Correspondence is given a 1- to 2-day review by the author, SMEs, management, DOE, and LANL legal. (See EM-AP-10082, Preparing Regulatory Correspondence.)

3. APPLICABILITY

Peer review is mandatory for regulatory deliverables due to NMED and EPA, products for DOE, and reports and plans for local and tribal governments. At the author's discretion, other non-regulatory documents may follow the peer review process. Attachment 2 provides the review, approval, and signature matrix for various document types.

Document peer review may be conducted in one of two ways: standard or the LANL Document Review Service (DRS).

The standard peer review includes a review notification request from the deliverables compliance manager to reviewers via email and will include PDF of the draft document along with the comment/resolution form. LANL file transfer is used to accommodate large files. The reviewer must use the form to provide any comments. The author must respond to all reviewer comments, meet with the reviewers to obtain their signatures, and return the completed forms to the deliverables compliance manager. Review is complete only when all required comments from reviewers have been resolved and incorporated into the comment/resolution form (see Attachment 3).

The DRS allows multiple individuals to review documents at the same time and immediately share their comments with the author and other reviewers. Comments are dispositioned electronically with a Web-enabled desktop application designed specifically for this task. Review is complete when all reviewer comments, author responses, and electronic signatures are captured by DRS and can be compiled into one printout.

4. PRECAUTIONS AND LIMITATIONS

Comments provided after the required review date will not be considered part of the formal review process without prior notification to the author. If the schedule permits, the author will be encouraged to incorporate late comments as appropriate and follow the formal comment resolution process.

5. RESPONSIBILITIES

5.1 Project Manager/Author

- Conducts decision peer review.
- Provides review draft to deliverables compliance team for editing and compositing.
- Gives the deliverables compliance manager adequate notice (at least 1 month before document is due to the regulator) and completes the electronic document services request form (Attachment 4) to request a review. A decision review is mandatory for all major regulatory deliverables requiring technical decisions before submittal to the regulatory authority (see section 2).
- Uses the matrix in Attachment 2 to identify reviewers.
- Reconciles reviewer comments via the comment/resolution form and obtains reviewer signature to complete the review process.
- Returns completed comment/resolution forms to the deliverables compliance manager.
- For DRS, ensures comments and electronic signatures are captured.

5.2 Deliverables Compliance Manager

NOTE *A completed comment/resolution form has the reviewer comments, author resolution, and reviewer signature. Completed comment/resolution forms end the standard review process. The Verification Phase ends the DRS review process.*

- Adds the review dates and reviewer names to the schedule.
- Sends out the review notification via email, sends out reminders when comments are due, and maintains all reviewer-completed comment/resolution forms.

6. REVIEW PROCESS

The following process is used for peer review.

6.1 Request Review

Project Manager/Author

- [1] **REQUEST** the appropriate review (refer to section 2) by completing and submitting the document services request form to the deliverables compliance manager.

NOTE *Refer to Attachment 2 for the document review, approval, and signature matrix to determine who must be included in the review.*

- [2] **OBTAIN** the current request form at <http://int.lanl.gov/org/dir/adem/environmental-remediation/writing.shtml>.
- [3] **PREPARE** a statement of the issues, including supporting information, to be addressed, and **INCLUDE** this information in the email request for review. This information instructs reviewers participating in any type of review.
- [4] **LIST** appropriate personnel on the document services request form (e.g., GIS, data steward, RCRA, regulatory compliance, risk, legal counsel, DOE, and/or other technical or SMEs).
- [5] **INDICATE** the section(s) reviewers should focus and comment on, if not the entire document.

NOTE *Reviewers receive the comment/resolution form (Attachment 3) when they receive the standard peer review email notification from the deliverables compliance manager.*

- [6] **PROVIDE** the deliverables compliance manager with an electronic version of the 95% draft of the document, including appendixes and attachments.

6.2 Schedule

Deliverables Compliance Manager

- [1] **RECEIVE** electronic document services request form.
- [2] **SET UP** the electronic folder that includes the review request, 95% draft document, and comment/resolution form.
- [3] **INCLUDE** the review time frame and the reviewers in the document schedule.
- [4] **REQUEST** Derivative Classifier or SAFE-1 review of documents intended for external distribution, including DOE, before peer review.
- [5] **DRAFT** the email to the reviewers transmitting the 95% draft document and comment/resolution form if the standard review process is followed.
- [6] **INCLUDE** the following information in the email for the standard peer review or request to the DRS point of contact:
 - a brief description of the item/issue to be reviewed or discussed
 - the person receiving and reconciling comments
 - the due date for comments to be received
 - any special review requirements provided by the project manager/author on the document service request form.
- [7] **EMAIL** the review notification to reviewers (including items mentioned above).

6.2 Schedule (continued)

Author

[8] For decision reviews:

- [A] **COORDINATE** the meeting time and location and email participants (may be delegated), including the deliverables compliance manager;
- [B] **DISTRIBUTE** information regarding any pertinent issues to reviewers at least 3 working days before the scheduled review;
- [C] **PREPARE** a summary documenting the decisions and recommendations within 2 working days after the meeting, and **DISTRIBUTE** the summary to the reviewers; and
- [D] **WORK** with the reviewers to address and resolve all concerns and **REVISE** the summary as necessary.

6.3 Review Proceedings

Reviewer

- [1] **FOLLOW** the guidance in the deliverables compliance manager's email review notification.
- [2] **READ** the original document in its entirety (unless otherwise instructed) to ensure technical accuracy and consistency with previous approaches and document types.
- [3] **CONCENTRATE** on the technical content of the document, focusing on area of expertise.
- [4] **RECORD** all comments on the comment/resolution form or the DRS. Includes entries that are informative and that address the issues completely to encourage an effective response to comment(s).

6.3 Review Proceedings (continued)

NOTE *Other than by prior agreement, only comments entered on the comment/resolution form are considered mandatory; therefore, the author is not required to address comments transmitted by other means. Tracked changes in documents reviewed electronically are acceptable, if the author approves. In lieu of a standard comment form, comments may be recorded in the margins of the hard copy document and returned, along with the form, to the project manager/author.*

[5] **ENSURE** comments are incorporated and/or addressed.

[6] **SUBMIT** the comment/resolution form to the project manager/author or click “done” in the DRS.

6.4 Comment Resolution

Author

NOTE *Comments require resolution acceptable to the reviewer or elevation to management, as in 6.4 [6] below. Recommendations as they appear on the comment/resolution form or document margins are incorporated as appropriate.*

[1] **RESOLVE** all comments as indicated on the comment/resolution form.

[2] **DIRECT** any questions concerning issues or comments to reviewer(s).

Reviewer

[3] **CONCUR** with the project manager’s/author’s responses by signing the comment/resolution form.

Author

[4] **SUBMIT** the completed, signed comment/resolution forms to the deliverables compliance manager after all comments have been resolved if the standard peer review process is used.

[5] **SUBMIT** peer-reviewed document to the deliverables compliance manager for final editing and compositing.

6.4 Comment Resolution (continued)

Reviewer/Author

[6] **IF** an issue cannot be resolved between a reviewer and the project manager/author, **THEN BRING** the issue to attention of the program director.

[7] **WORK** with the program director to discuss and resolve the issue(s).

Author

[8] **DOCUMENT** the resolution on the comment/resolution form and **RETURN** it to the reviewer for concurrence and signature.

[9] **CONTINUE** comment resolution.

[10] **IF** the standard review process is used, **THEN TRANSMIT** the completed comment/resolution forms to the deliverables compliance manager.

NOTE *Completed forms include reviewer comments, the project manager's/author's resolutions to the comments, and the signature of each reviewer if the standard peer review process is used. Review using the DRS is complete when all reviewer comments, author responses, and electronic signatures are captured by DRS.*

Deliverables Compliance Manager

[11] **SCAN** the completed comment/resolution forms (all pages), and **ARCHIVE** each reviewer's form as a PDF in the 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.

Deliverables Compliance Manager

NOTE *Staff have access or can obtain access to both Electronic Document Management System repositories in ADEM and ADESH. MS Word files and forms are kept with the document manager/administrator and/or designee.*

[1] **SUBMIT** final records, including the date-stamped letter and attachments/documents, to ADEM and/or ADESH Records.

8. REFERENCES

ADESH-AP-006, Records Management Plan

EM-AP-10082, Preparing Regulatory Correspondence

EM-AP-10089, Formalizing Regulatory Communications

EP-AP-10003, Records Management

P1020-1, Laboratory Records Management

9. ATTACHMENTS

Attachment 1: Peer Review Process Flow Chart

Attachment 2: Review, Approval, and Signature Matrix

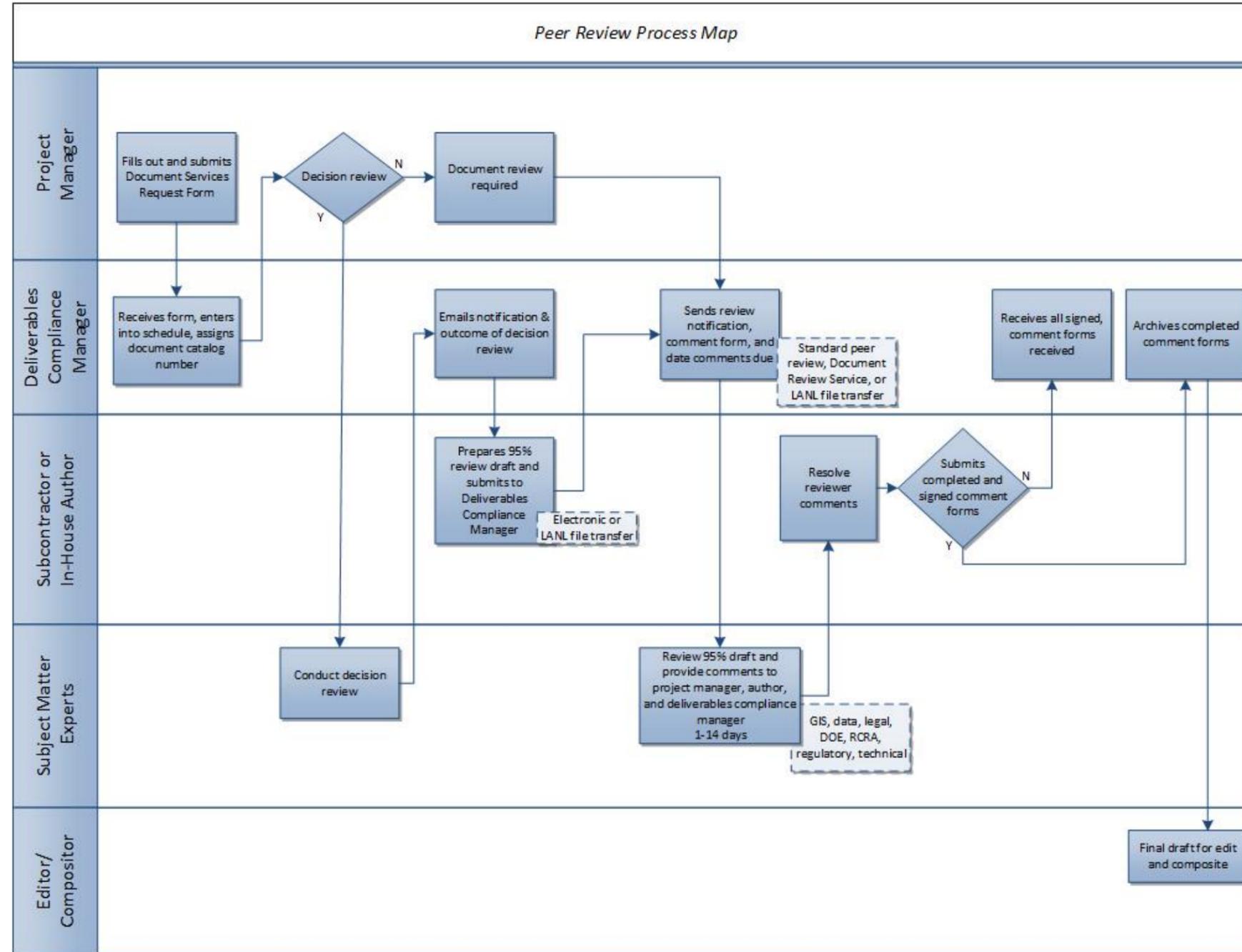
Attachment 3: Sample Comment/Resolution Form

Attachment 4: Document Services Request Form

ATTACHMENT 1

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Peer Review Process Flow Chart



ATTACHMENT 2

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Review, Approval, and Signature Matrix

Document Type	Editing and Composition <i>REQUIRED</i>	Peer Review <i>REQUIRED</i>	Data Steward	Geographic Information System	Regulatory Compliance	Engineering	Quality Assurance	EPC-RCRA ^a	Legal Counsel	DOE Reviewer ^b	Project Manager	Program Director	Unreviewed Safety Question Reviewer	DC/ Classification Review	Signatures Required			
															Program Manager DOE	Program Director/ Responsible Line Manager	Owner/ Operator ^c and Engineering Certification	Associate Director Environmental Management
Access Agreement	X	X	—	X	X	X	—	X	X	X	X	X	—	X	X	X	—	X
Deliverables and Products to NMED, EPA, and DOE	X	X	X	X	X	X	—	X	X	X	X	X	—	X	X	X	—	X
Communication Record (Phone, Email, Meeting)	—	—	—	—	X	—	—	—	—	—	X	X	—	—	—	—	—	—
Correspondence (Internal/External; Notification; Memo)	X	X	—	—	X	X	—	X	X	X	X	X	—	X ^d	X	X	—	X
Digital Data (Map, Drawing, Photo, Chart)	X	—	X	X	—	X	—	—	—	—	X	—	—	X	—	—	—	—
Financial Document (e.g., Baseline, PEPs, BCPs)	X	—	—	—	—	—	—	—	—	—	X	X	—	—	X	X	—	X
Memorandum of Understanding	X	X	—	—	X	—	X	X	X	—	X	X	—	X	—	—	—	—
Public Relations Document (Poster, Technical Paper, Viewgraph)	X	X	—	—	—	—	—	X	—	—	X	X	—	X	—	X	—	X
Risk Assessment Methodology	X	—	—	—	X	X	X	X	—	X	X	—	—	—	—	—	—	—
Remedy Completion or Closure Plan/Report	X	X	X	X	X	X	—	X	X	X	X	X	—	X	X	X	X	X
Safety and Security Plan/Report	—	X	—	—	—	—	X	X	—	X	X	—	—	X	—	—	—	—
Standard Operating Procedure ^e	X	X	—	—	—	—	X	—	—	—	X	X	X	—	—	—	—	—
Statement of Work/Task Order ^f	X	X	—	—	—	—	X	—	—	—	—	X	—	—	—	—	—	—
Waste Characterization Strategy Form and Amendments	—	X	—	—	—	—	—	X ^g	—	—	X	—	X	—	—	—	—	—

Notes: X = Required. — = Not required. Some authorizations do not appear on the document catalog signature form. Author review and approval are required for all documents. All documents to NMED require editing and composition by members of the Deliverables Compliance Team. All final documents must be submitted to records. Columns shaded in orange indicate optional review by subject matter experts.

^a EPC-RCRA review is required only if document (1) is a requirement of the Compliance Order on Consent or the Hazardous Waste Facility Permit or if it includes related compliance information, (2) is a submittal to the administrative authority, and/or (3) includes information concerning solid, hazardous, radioactive, or toxic waste management.

^b DOE review cannot precede internal or (Laboratory) legal review and approval. Obtain a Derivative Classifier review before documents are distributed to DOE.

^c Owner/operator certification pursuant to 20.4.1.900 New Mexico Administrative Code, 270.11(b-d) is required for final remedy completion reports and closure plans/reports. An engineering certification is also required.

^d Attachments to correspondence require SAFE-1 review for an LA-UR number.

^e Procedures relating to nuclear environmental sites must also be approved by the responsible division leader and the responsible line manager and require an unreviewed safety question analysis.

^f Acquisition Services Management (Procurement) is responsible for SAFE-1 review of statements of work and/or task orders.

^g Technical reviewers for waste characterization strategy forms/amendments are also the waste management coordinators and EPC-Waste Services representatives. *Note:* Other waste/field documents such as integrated work documents, site-specific health and safety plans, and field implementation plans are completed by subcontractors. Waste profile forms are completed using the Waste Compliance and Tracking System.

ATTACHMENT 3

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Sample Comment/Resolution Form

Comment/Resolution Form					
					
PART 1 (to be completed by the deliverables compliance manager)				Today's date:	
Title of document: Title			EP Document Catalog #: EP201x-00	Rev. #:	
Reviewer's name:			Phone:	Comments DUE:	
Author's name: PM/Author			Phone: (505) telephone/email		
<i>Return completed and signed forms to the deliverables compliance manager</i>					
PART 2 (to be completed by the reviewer and PM/author as appropriate)					
Reviewer signature (sign after verifying final resolution):					
Comment #	Location ¹	M/R ²	Reviewer's Comments	A/R ³	Author's Proposed Revision/Resolution

¹page, paragraph, line

²M = mandatory / R = recommended

³A = accept / R = reject

ATTACHMENT 4

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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.: _____	