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**Contents: Requesting SBMS Variances**

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

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<a href="#">1. Establishing Equivalency with a Laboratory-Wide Required Procedure</a>	<ul style="list-style-type: none"> <li>• Determine and obtain approval for equivalent means.</li> </ul>
<a href="#">2. Identifying and Documenting a Variance Approach</a>	<ul style="list-style-type: none"> <li>• Select variance approach.</li> <li>• Document variance.</li> </ul>
<a href="#">3. Obtaining Review and Approval of Variance Documentation</a>	<ul style="list-style-type: none"> <li>• Obtain approvals.</li> <li>• Submit approved variance forms.</li> </ul>
<a href="#">4. Implementing a Variance</a>	<ul style="list-style-type: none"> <li>• Revise affected documents.</li> <li>• Notify staff.</li> <li>• Implement variance.</li> <li>• Maintain record copy of variance.</li> </ul>

[Definitions](#)

**Exhibits**

None

**Forms**

[Internal Variance Request and Approval Form](#)

## Training Requirements and Reporting Obligations

This subject area does not contain training requirements.

This subject area may or may not contain reporting obligations. See the subject area until obligations are listed here.

## References

BNL Radiological Control Manual, Chapter 1, Article 113, "Compliance" provides instructions regarding technical equivalency determinations, variances, and other changes to the Radiological Control Manual requirements

equivalency determinations, variances, and other changes to the Radiological Control manual requirements.

[Laboratory-wide Procedures and Guidelines](#) subject area

## Standards of Performance

All staff and guests shall comply with applicable Laboratory policies, standards, and procedures, unless a formal variance is obtained.

## Management System

This subject area belongs to the management system.

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### Introduction: Requesting SBMS Variances

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The Laboratory complies with all applicable required procedures, either directly or through equivalent means of achieving the intent of the required procedure. When conformance with a required procedure or its intent is not possible, either through direct compliance or an equivalent means of complying, activities do not proceed until a variance from the required procedure is approved.

Variances are not pursued for convenience. Requests for variances may be appropriate if

- the required procedure does not reflect the nature or uniqueness of work
- the required procedure conflicts with another required procedure
- the required procedure is not necessary to achieve its underlying purpose
- the required procedure is not cost-effective relative to the benefits gained from its application
- application of the required procedure would derive results that are significantly different than originally intended
- the benefits of exemption outweigh any potential detriment caused by not granting the exemption
- circumstances could justify a variance, as long as good faith action is taken to comply with its intent
- circumstances that arise were not initially addressed by the required procedure for which it would be in the customer's best interest to grant an exemption.

This subject area identifies the process for how staff request variances from any Laboratory-wide required procedure set forth in the Standards-Based Management System (SBMS). The information applies to any deviation from these Laboratory-wide required procedures, whether they are driven by internal or external requirements. The Laboratory may interpret external codes and standards for making internal judgments regarding compliance. The external regulatory agencies make the final judgments regarding compliance with external requirements. Be aware that some external regulations and established site permits do not allow for any variances.

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### 1. Establishing Equivalency with a Laboratory-Wide Required Procedure

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

## Applicability

This section applies to staff who have identified a potential conflict with complying with a Laboratory-wide required procedure.

## Required Procedure

Potential conflicts with implementing Laboratory-wide requirements must be evaluated to determine if an equivalent means of compliance is achievable or if a variance is required.

Work can proceed more efficiently and effectively if staff establish an equivalent means for meeting a requirement (rather than requesting a variance from a requirement), as follows:

<b>Step 1</b>	<p>Work with the subject matter expert, as needed, to determine if an equivalent means for complying with the required procedure can be established.</p> <ul style="list-style-type: none"> <li>If it is feasible to meet the required procedure with equivalent means, obtain subject matter expert approval, implement the equivalent method, and proceed with the work.</li> <li>If equivalency with a required procedure cannot be established, go to <a href="#">Identifying and Documenting a Variance Approach</a>.</li> </ul>
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## Guidelines

It is good management practice to document the equivalency logic and retain it on file as evidence of its underlying rationale and approval.

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## 2. Identifying and Documenting a Variance Approach

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

## Applicability

This section applies to staff who have confirmed the need for a variance from a Laboratory-wide required procedure.

## Required Procedure

Any deviation from compliance with a Laboratory-wide required procedure must be identified and documented.

The staff member requesting the variance takes the following steps.

<b>Step 1</b>	<p>Identify and evaluate options for complying with the required procedure.</p> <p><b>Note:</b> Obtain technical input and assistance from the subject matter experts and management system steward, as needed.</p>
<b>Step 2</b>	<p>Contact the subject matter expert to</p> <ul style="list-style-type: none"> <li>• determine whether a variance is an option</li> <li>• select the variance approach</li> <li>• determine whether the required procedure is based on an internal requirement or an external requirement</li> <li>• determine if the proposed change can be verbally approved by the SME (e.g., one-time variation in accomplishing the work) or if it requires preparation of the variance documentation (e.g., a permanent alternate method for satisfying the Laboratory-wide requirement).</li> </ul>
<b>Step 3</b>	<p>Document the variance.</p> <ul style="list-style-type: none"> <li>• Verbal approvals are not required to be documented.</li> <li>• When documenting a variance from an internal requirement, staff complete an <a href="#">Internal Variance Request and Approval Form</a> or equivalent documentation.</li> <li>• When documenting a variance from an external regulatory requirement, staff contact the subject matter expert or management system steward for guidance in addressing the required procedure.</li> </ul>
<b>Step 4</b>	<p>When variance documentation is completed, <a href="#">obtain review and approval of the variance documentation</a>.</p>

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## Guidelines

Although neither the requesting staff member nor the SME are required to document verbal approvals of variances, the approval should be noted (e.g., log book, journal, or records generated as a result of performing the procedure).

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### 3. Obtaining Review and Approval of Variance Documentation

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

## Applicability

This section applies to staff who have prepared a variance request.

## Required Procedure

Variance requests must be reviewed and approved following the procedure described below.

<b>Step 1</b>	<p>The staff member initiating the request, the supervisor, and/or the building manager (if building equipment or systems are affected) review and concur on the variances to internal requirements.</p> <p><b>Note:</b> Contact your subject matter expert or management system steward, as needed, to identify appropriate reviewers.</p>
<b>Step 2</b>	<p>The variance requestor transmits the reviewed variance request to the management system steward.</p>
<b>Step 3</b>	<p>The affected management system steward ensures that an appropriate subject matter expert reviews and concurs with the variance request. The steward then provides final approval of the variance.</p> <p><b>For external variances only</b>, the subject matter expert and management system steward review and approve (internally), variances from external requirements. The management system stewards submit requests for variances to any external regulation (via letter) to the appropriate regulatory agency (e.g., DOE, EPA, NYSDEC).</p>
<b>Step 4</b>	<p>The management system steward submits the signed original of the approved variance request to SBMS Requirements Management, where the variance number is assigned.</p>
<b>Step 5</b>	<p>The subject matter expert informs the requestor and his/her direct supervisor that approval has been granted, and provides a copy of the approved variance to the requestor.</p>
<b>Step 6</b>	<p>The requestor provides copies of the approved variance to his/her project manager and direct supervisor.</p>
<b>Step 7</b>	<p>When a completed variance request is approved, <a href="#">implement the variance</a> as described in the next procedure.</p>

## Guidelines

It is recommended that each management system have internal procedures that cover their method for obtaining variances from the specific regulatory agencies with whom they directly interface. This helps streamline the variance request/approval process and makes sure that the correct levels of approval are obtained.

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#### 4. Implementing a Variance

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

## Applicability

This section applies to staff and management system stewards who have received an approved variance.

## Required Procedure

Variances must be implemented as approved and records of the approved variance must be maintained as described in the procedure below.

<b>Step 1</b>	<p><b>If the variance affects only a specific activity</b>, the staff member who requested the variance</p> <ul style="list-style-type: none"> <li>• ensures that the affected technical or operating procedure and/or any other affected documentation are revised</li> <li>• ensures that the affected staff are notified and trained, as appropriate</li> <li>• implements the variance and proceeds with the work.</li> </ul> <p><b>Note:</b> The management system steward needs to ensure that the variance does not adversely affect other Laboratory operations.</p> <p><b>If the variance affects the entire Laboratory</b>, the management system steward initiates the revision of any affected procedures as described in the <a href="#">Laboratory-wide Procedures and Guidelines</a> subject area.</p>
<b>Step 2</b>	SBMS Requirements Management maintains a record copy of all approved variances.

## Guidelines

It is good management practice to retain the variance documentation on file, by project or activity, as evidence of the rationale for the approved variance approach.

## References

[Laboratory-wide Procedures and Guidelines](#) subject area

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### Internal Variance Request and Approval Form

Effective Date: **March 1999**

Point of Contact: [SBMS Requirements Management](#)

Staff requesting variances from internal Laboratory-wide required procedures may complete this form to document and obtain approval of any proposed variance approach.

[Internal Variance Request and Approval Form](#) (download as a Word 6.0 file).

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**Internal Variance Request and Approval**

Variance #: \_\_\_\_\_ Page 1 of \_\_\_\_

Initiating Organization: \_\_\_\_\_

Management System Steward: \_\_\_\_\_

Variance Type:  Permanent  Temporary      Start Date: \_\_\_\_\_ End Date: \_\_\_\_\_

**1. Identify the Relevant Requirement:**

**2. Describe Subject/Operation Affected by the Required Procedure:** *(Provide background for variance request; describe project operation, activity, group, how they are affected by the required procedure, and why the required procedure cannot be met.)*

**3. Describe the Variance Approach:** *(Analyze the approach and describe how it will satisfy the required procedure.)*

**4. List Required Actions:** *(List actions to be taken based on the analysis of the approach in step 3.)*

Staff Member: \_\_\_\_\_ Phone #: \_\_\_\_\_ MSIN: \_\_\_\_\_  
*(variance requestor)*

**Approvals:**

Requesting Staff Member: \_\_\_\_\_ Date: \_\_\_\_\_

Subject Matter Expert: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_  
and/or

ES&H Coordinator: \_\_\_\_\_ Date: \_\_\_\_\_

Management System Steward \_\_\_\_\_ Date: \_\_\_\_\_

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**Definitions: Requesting SBMS Variances**

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There are no definitions for this subject area.

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Revision History: Requesting SBMS Variances

Point of Contact: [SBMS Requirements Management](#)

## Revision History of this Subject Area

Date	Description	Management System
March 1999	This subject area was developed to provide a process for line managers to request a variance to established BNL Laboratory-level procedures.	Standards-Based Management System

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