

**Swift & Staley Team/DOE Paducah Site
Classification Office (CO)/Technical Information Office (TIO)
and Operations Security (OPSEC) Release Form**

To Be Completed by Person Requesting Release
(Required to be completed prior to submittal to CO/TIO/OPSEC)

Date 05/08/2009 Date Release is Required 05/13/2009

Person Requesting Release Teresa Overby Phone Number (270) 441-5188

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Organization Paducah Remediation Services, LLC, SPCI

Document Number _____ Number of Pages 300 pages

Accession Number (DMC only) _____

Document Title/Date PRS-WCE-0027, FIELD CHANGE REQUEST (FCR), FIELD CHANGE NOTICE (FCN), AND DESIGN CHANGE NOTICE (DCN) PROCESS, 08/25/2008

Author _____ Corporate Author _____

Media (Check all that apply)

Paper Photo Diskette Drawing Video CD Report/Letter Other _____

Project Subcontract/Task Order _____

Requestor/Purpose of Release Public

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Classified Yes No
ECI Yes No

UCNI Yes No
OUO Yes No

Type of Release (Check One)

Public Release Internal Release Only Limited Release

Reason (Check all that apply)

Circumvention of Statute Statutory Exemption Commercial/Proprietary
 Personal Privacy Privileged Information OPSEC

Other/Comments _____

DC *M. Brennan* Date MAY 11 09

TIO *M. Brennan* Date MAY 11 09

Reviewing Official _____ Date _____

OPSEC *M. Brennan* Date MAY 11 09

OWNER: WORK CONTROLS AND ENGINEERING	PRS-WCE-0027	REV. NO. 0
SUBJECT MATTER AREA: ENGINEERING	PREPARER: K. L. Holt	Page 1 of 19
DOC TYPE: <input checked="" type="checkbox"/> PROCEDURE <input type="checkbox"/> POLICY	APPROVED BY/DATE: Tim Fralix 7/22/2008 signature on file in DCC	
PROC TYPE: <input checked="" type="checkbox"/> OPERATING PROCEDURE <input type="checkbox"/> FACILITY SPECIFIC PROCEDURE FACILITY:		
TITLE: FIELD CHANGE REQUEST (FCR), FIELD CHANGE NOTICE (FCN), AND DESIGN CHANGE NOTICE (DCN) PROCESS		
USQD <input checked="" type="checkbox"/> UCD <input type="checkbox"/> CAT EX <input type="checkbox"/>	EFFECTIVE DATE: 08/25/2008	
USQD/UCD No: USQD-PH-SITE-0088R1	REQUIRED REVIEW DATE: 7/22/2011	
Mandatory Subcontractor Pro Forma Procedure? <input checked="" type="checkbox"/>	If an interim Procedure, Expiration Date:	

REVISION LOG		
Revision Number	Description of Changes	Pages Affected
0	Initial Release; Replaces BJC-DE-1008.	All

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1.0 PURPOSE

This procedure defines the work processes and requirements for the preparation, review, implementation, disposition, and control of Field Change Requests (FCR), Field Change Notices (FCN), and Design Change Notices (DCN).

FCRs, FCNs, and DCNs are elements of the overall change control program pertaining to the interface between Engineering and organizations performing work in the field.

FCNs are prepared during field activities to document minor field changes to an approved engineering design document, in which the intent of the approved design is not altered and the changes are made within the established constraints of the approved design and will usually be accompanied by “red line” changes/drawings showing the “as constructed condition.”

NOTE: Engineering design documents are defined as scopes of work, drawings or specifications. The change process for project work instructions is defined by applicable PRS Work Control procedures.

FCRs are issued by Field Engineers to document requested design changes that require Engineering review and concurrence before they may be implemented. The FCR/FCN process is illustrated in Attachment C.

DCNs are generated by Engineering to document design changes resulting from FCRs and FCNs, as deemed necessary by the Engineering Manager.

2.0 SCOPE

This procedure applies to design changes proposed during construction, installation, testing, inspection, or decommissioning where Paducah Remediation Services LLC (PRS) is responsible for the design and/or construction management.

3.0 PROCEDURE

3.1 Establishing Criteria for Field Changes Allowed Under FCNs

Engineer

3.1.1 As part of the engineering design effort, establish specific criteria for field decisions that might be necessary to implement the design. Define the criteria commensurate with the work, considering the type of work, risks, uncertainties, interfaces, regulatory commitments, etc. Incorporate the criteria into the engineering design documents.

NOTE: Preparation of engineering design documents are governed by other procedures and forms.

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3.1.2 Ensure, with the help of the PRS USQD/UCD Preparer/Reviewer-qualified personnel, that the approved design and the criteria for making field changes to the design are within the bounds of the approved Safety Basis (SB) for the facility or activities planned.

Field Engineer **3.1.3** Have a clear understanding of the criteria for allowable field changes. If there is a question whether a proposed field change is within the established criteria, proceed with an FCR prior to implementing the change.

3.2 Preparation of FCRs and FCNs

Field Engineer **3.2.1** Identify the type of document needed (FCR or FCN), and obtain a control number from the Engineering Manager.

Engineering Manager **3.2.2** Assign a control number per PRS-DOC-1004, *Document Numbering and Issuance*, and notify Field Engineer.

Field Engineer **3.2.3** Enter the control number on the Field Change Request/Field Change Notice Log (See Attachment D).

NOTE 1: Attachment B provides additional guidance in determination of proper change document.

NOTE 2: For FCRs, the Field Engineer is responsible for identifying the need for a field change. For FCNs, the Field Engineer is responsible for verifying that the work in the field has been completed within the criteria established by Engineering.

3.2.4 Prepare the FCR or the FCN in accordance with the instructions provided with the form WCE-F-0045. Supporting documentation may include figures, photos, vendor information, etc.

NOTE: The Field Engineer shall maintain a working file from inception of the FCR or FCN through disposition by Engineering.

3.2.5 Provide the FCR/FCN to the Front Line Supervisor for review and concurrence.

Front Line Supervisor **3.2.6** Review the FCR/FCN **and** sign the FCR/FCN **and** return the form to the Field Engineer for processing **or** resolve comments with the Field Engineer.

Field Engineer **3.2.7** Forward the original FCR/FCN to the Engineering Manager for review and approval. Keep a copy of the form until the FCR/FCN has been dispositioned.

3.3 Review and Approval Process for FCRs and FCNs

Engineering Manager **3.3.1** Assign the FCR/FCN to the cognizant Engineer/Subject Matter Expert (SME) for evaluation.

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NOTE : SMEs are as defined in PRS Procedure PRS-WCE-0028, *Standards and Requirements Management*.

- Engineer/SME **3.3.2** Consult with the Field Engineer as necessary to understand the change. Involve SMEs and/or other disciplines as needed.
- 3.3.3** Evaluate and coordinate the review of the FCR/FCN, including the following items:
- Completeness, clarity, and acceptability of the technical solution
 - Conformance to established design requirements (e.g., design criteria, permits, regulations, codes and standards, and PRS procedures and policies)
 - Good design practice
 - Interface issues
 - Identification of any other affected documents
 - Potential effects on scope, schedule, cost, and/or risk
 - Potential effects on safety or environmental issues
 - Potential effects on emergency preparedness issues
 - Potential effects on security issues
 - Potential effects on the SB
 - Whether review is needed from other organizations (e.g., Nuclear Safety; Quality Assurance; or Environment, Safety and Health; etc.)
 - The date when changes are required.
- 3.3.4** As soon as possible, notify the Engineering Manager if the FCR/FCN disposition cannot be completed by the date requested.
- Engineer/SME **3.3.5** Submit FCR/FCN to Nuclear Safety for USQD/UCD screening.
- NOTE:** UCD/USQD screening must be complete and approved prior to Field Changes being implemented.
- Nuclear Safety **3.3.6** Perform USQD/UCD screening to ensure FCR/FCN complies with the facility's safety basis.
- 3.3.7** Report results of USQD/UCD screening to Engineer/SME.
- Engineer/SME **3.3.8** If results of USQD/UCD screening are unfavorable (change would not comply with facility's safety basis), reject FCR/FCN.
- 3.3.9** Based on the evaluation, take one of the following actions:
- a. Approve the FCR/FCN as is or with comments.

OR

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- b. Disapprove the FCR/FCN, and record the reason for disapproval in the "Remarks" section of the form **and** skip to section 3.3.18 of this procedure.

3.3.10 Indicate if the approved change requires revision to the affected documents by marking "Yes" or "No" in the below the "FCR/FCN Incorporation Required" block.

- a. Mark "Yes" when changes are to be incorporated into any of the affected documents. Remarks shall include identification of the specific documents into which the change is to be incorporated, unique directions for incorporating the change, etc.
- b. Mark "No, See Remarks" only if changes are not to be incorporated in an affected document. Include a justification under "Remarks."

NOTE: FCRs and FCNs shall be incorporated into the design documents according to the following criteria:

- The FCR or FCN results in an "as-built" condition, or if
- Engineering determines that if the change is not incorporated, the lack of information could create discontinuity in change control of design.

3.3.11 Sign and date form. Provide the original form to the Engineering Manager for approval.

Engineering
Manager

3.3.12 Review the FCR/FCN and the engineering evaluation. Consult with the Engineer as necessary. Sign the FCR/FCN to indicate concurrence with the evaluation. Return the signed form to the Engineer for processing **OR** determine if a DCN should be prepared. If a DCN is to be prepared skip to section 3.4 of this procedure.

Engineer/SME

3.3.13 Discuss approved FCRs with Project Manager relevant to cost and/or schedule impacts. Any FCR that requires additional funding or has an impact on schedule must be approved by the Project Manager prior to implementation.

Project Manager

3.3.14 **IF** required, as indicated above, **THEN** review and sign the approved FCR. Return form to Engineer.

Engineer/SME

3.3.15 Discuss the FCR/FCN with the Facility Manager.

Facility Manager

3.3.16 Review and sign the approved FCR. Return form to Engineer.

Engineer

3.3.17 Transmit the FCR/FCN (approved and disapproved) to the Field Engineer.

Field Engineer

3.3.18 For disapproved FCNs, take one of the following actions as

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appropriate:

Field Engineer

- a. Correct deficiencies in the FCN (e.g., insufficient backup information), and prepare a new FCN with a new FCN number. Include a reference to the disapproved FCN. Process the corrected FCN as before.

OR

- b. Follow PRS-QAP-1440, *Control of Nonconforming Items and Services*, for resolution. Under "Remarks" on the FCN, indicate the action taken to rectify the nonconformance. This step does not apply to disapproved FCRs.

3.3.19 For disapproved FCRs, evaluate the disapproval remarks. If a design change is still deemed necessary, prepare a new FCR that resolves the reason for disapproval. The new FCR requires a new number. Process the new FCR as before.

3.4 Preparation of DCNs

Engineering Manager

- 3.4.1** Review design changes requested by the FCR or FCN process to determine if a DCN should be prepared to document those changes.

Engineering Manager/
Originator

- 3.4.2** **IF** a DCN is deemed necessary, **THEN** complete the DCN form WCE-F-0054. Obtain the control number per PRS-DOC-1004, *Document Numbering and Issuance*.

NOTE: The Engineering Manager may delegate responsibility for review, and preparation of the DCN to the Engineer.

Engineering Manager

- 3.4.3** Assign a checker for the DCN. The checker must have equivalent qualifications as the person who prepared the DCN.

Checker

- 3.4.4** Check the DCN.

- 3.4.5** If the DCN is found to be acceptable, sign and date the DCN. If the DCN is not acceptable, resolve comments with the preparer of the DCN.

Engineering Manager/
Originator

- 3.4.6** Issue the DCN to all groups affected by the changes involved.

3.5 Changes to FCRs, FCNs, and DCNs

NOTE: An issued (approved) FCR, FCN, or DCN shall not be revised or reissued but may be supplemented, cancelled, superseded, or voided by issuing another FCR, FCN, or DCN in accordance with the following guidelines:

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- The new FCR, FCN, or DCN affects the old document in its entirety (e.g., no partial superseding).
- A FCR, FCN, or DCN issued to cancel an approved FCR, FCN, or DCN must clearly address the disposition of "all" documents identified on the cancelled FCR, FCN, or DCN.
- The new FCR, FCN, or DCN shall "stand alone," with applicable information transferred to the new document and the old document listed in the "Affected Documents" section on the new form.
- A new FCR, FCN, or DCN that cancels, supersedes, or supplements an approved FCR, FCN, or DCN shall identify the FCR, FCN, or DCN and clearly state that it cancels or supersedes the referenced FCR, FCN, or DCN.
- Under no circumstances can a FCR, FCN, or DCN be superseded or voided after the work described on the FCR, FCN, or DCN has been implemented.

NOTE: FCRs that are approved by Engineering, but are not implemented in the field may be cancelled by a FCN.

3.6 Incorporation of FCRs, FCNs, and DCNs into Affected Documents

Engineer

3.6.1 IF indicated on the FCR/FCN, **THEN** incorporate the change into the affected engineering documents.

NOTE : Finalized FCRs, FCNs, and/or DCNs shall become part of the approved design documents and shall be affixed to paper copies of the design documents and retained by the Engineering Manager until they are incorporated into the next design revision as needed (see note below). In the interest of configuration control, copies of the finalized FCNs and/or DCNs on designs by others shall be transmitted to the appropriate organization.

NOTE: Approved changes to PRS design documents shall be incorporated into the affected documents in a timely manner as defined by the Engineering Manager with consideration of the project specific requirements, type of work, etc. Typically, changes should be incorporated within the following time limits:

- Within one month after a total of three DCNs or FCNs have been issued against the current revision of a design document.
- Within three months after the first outstanding DCN or FCN has been issued against the current revision of the design documents.

3.6.2 For approved FCRs, the DCN or revised engineering document shall be issued prior to implementing the change in the field.

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4.0 RECORDS

4.1 Record and Document Control

4.1.1 Records shall be managed per PRS-DOC-1009, *Records Management, Administrative Records, and Document Control*.

5.0 SOURCE DOCUMENTS

NOTE: The PRS blue-sheeted BJC procedures referenced in this document are the active procedures as the date of issuance of this procedure. Procedures noted in the parentheses [brackets] will become the reference procedures once these procedures are approved and implemented by Paducah Remediation Services, LLC.

- PA-1024, *Scopes of Work at Paducah* [PRS-WCE-0033, *Scopes of Work*]
- PRS-WCE-0014, *Project Specifications at Paducah*
- PRS-WCE-1027, *Project Drawings*
- PRS-DOC-1004, *Document Numbering and Issuance*.
- PRS-WCE-0028, *Standards and Requirements Management*

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Attachment A
DEFINITIONS/ACRONYMS
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DEFINITIONS

Design Change Notice (DCN) – A document which may be used by Engineering to transmit a revision of an approved engineering design document (e.g., drawing, specification, etc.) to the affected parties. A DCN may be generated to address required changes identified by Engineering, the FCR/FCN Process, or a Subcontractor. See form WCE-F-0054.

Field Engineer – A person authorized by the Engineering Manager to be responsible for tasks such as planning, assembling, and monitoring field work.

Field Change Notice (FCN) – A document originated by field personnel to identify minor field changes to an approved engineering design document, in which the intent of the approved design is not altered and the changes are made within the established constraints of the approved design. An FCN documents and justifies the change and provides formal notification of the change to Engineering. The FCN does not require the Engineer of Record's acceptance prior to implementation, and may be implemented upon approval by the Front Line Supervisor. FCNs in general are not considered as engineering changes because they reflect variations in configuration authorized by the approved engineering documents. FCNs are not used to document nonconformances or violations of project specifications, regulatory code or legal requirements. FCNs are expected to be used on a limited basis. See form WCE-F-0045. FCNs are generally limited to changes that do not affect fit, form, or function of the intended design. FCNs are also used to document the final configuration "as built condition" and may be used to transmit "red lines."

Field Change Request (FCR) – A document used to request from Engineering a change to an approved engineering design document in which the change may affect the original design intent or the changes would be outside the established constraints of the approved design. FCRs are not used to document nonconformances or violations of project specifications, regulatory code or legal requirements. Engineering approval of the FCR is required prior to implementing the change in the field. See form WCE-F-0045.

Front Line Supervisor – A person appointed by the Project Manager to be responsible for execution of an approved engineering design.

Engineer – A person appointed by the Engineering Manager to be responsible for the technical design components of a specific project or task, and for performing engineering evaluations of FCRs and FCNs for their specific project.

Nonconformance Report – A document issued by any party to notify Engineering of field conditions outside the boundaries or limitations previously approved by Engineering. Nonconformance reports are outside of the scope of this procedure; refer to procedure PRS-QAP-1440.

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Attachment A
DEFINITIONS/ACRONYMS
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Safety Basis (SB) – Those aspects of the facility design basis and operational requirements relied upon by DOE to authorize operation. The SB is important to the safety of facility operations.

Unreviewed Change Determination (UCD) – A formal, documented safety evaluation by a qualified person for a radiological or non-nuclear facility to ascertain if a change (or as-found condition) could result in a facility being outside its facility SB documentation. This shall be performed per procedure BJC-NS-1008 [PRS-WCE-1008].

Unreviewed Change Determination (UCD) Screening – A formal, documented evaluation by a qualified person for a radiological or non-nuclear facility that determines whether a UCD is required to be performed. This shall be performed per procedure BJC-NS-1008 [PRS-WCE-1008].

Unreviewed Safety Question Determination (USQD) – A formal, documented safety evaluation by a qualified person for a Nuclear Category 2 or 3 facility to ascertain if a change (or as-found condition) could result in a facility being outside its facility SB documentation. This shall be performed per procedure BJC-NS-1001 [PRS-WCE-1001].

Unreviewed Safety Question Determination (USQD) Screening – A formal, documented evaluation by a qualified person for a Nuclear Category 2 or 3 facility that determines whether a USQD is required to be performed. This shall be performed per procedure BJC-NS-1001 [PRS-WCE-1001].

ACRONYMS

DOE – United States Department of Energy

PRS – Paducah Remediation Services, LLC

USQD – Unreviewed Safety Question Determination

SME – Subject Matter Expert

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Attachment B
GUIDANCE FOR DETERMINING FCR vs. FCN
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Field Change Requests (FCR) are used to request changes and Field Change Notices (FCN) are used to document changes from the current issued-for-construction design documents. However, FCN changes shall be within the boundaries or limitations previously established by Engineering.

Due to the “at risk” nature of FCNs, sound judgment must be used in the development of the change that is implemented and in the selection of the appropriate document (FCN vs. FCR).

The following examples are intended to illustrate the usage of FCRs vs. FCNs. They illustrate the considerations for selecting the appropriate method for documenting necessary field changes.

FCRs are required when:

- Regulatory documents such as the Building Code or OSHA dictate that Engineering (e.g., Engineer of Record) is required to approve the change
- Rework could be significant or extensive if subsequent reviews determine that a change identified in a FCN violated project technical requirements.
- An equivalent substitution for a component is not readily known, requiring an evaluation by Engineering to determine equivalency.
- A change to a support that significantly decreases its capacity (e.g., increasing cantilever length, reduction in member sizes, etc.).
- Changes to seismically analyzed structural items and components.
- Changes to stress in analyzed pipe systems.
- Substitution of electrical cables.
- Changes to critical documents such as Plot Plans, P&IDs, and Line Designation Tables.
- Changes to Technical Specifications.
- Change that requires the design document(s) to be re-certified by a Professional Engineer.
- Change that impacts the approved environmental, right-of-way, zoning, building, and/or encroachment permit.
- Change that may adversely impact safety.
- Changes to supplier documents.
- Relocating remote mounted instruments.
- Change that impacts any supporting analysis, calculations, system, structure, or equipment design basis, performance, or warranties.
- Changes that affect waterways, wetlands, or other sensitive environments.

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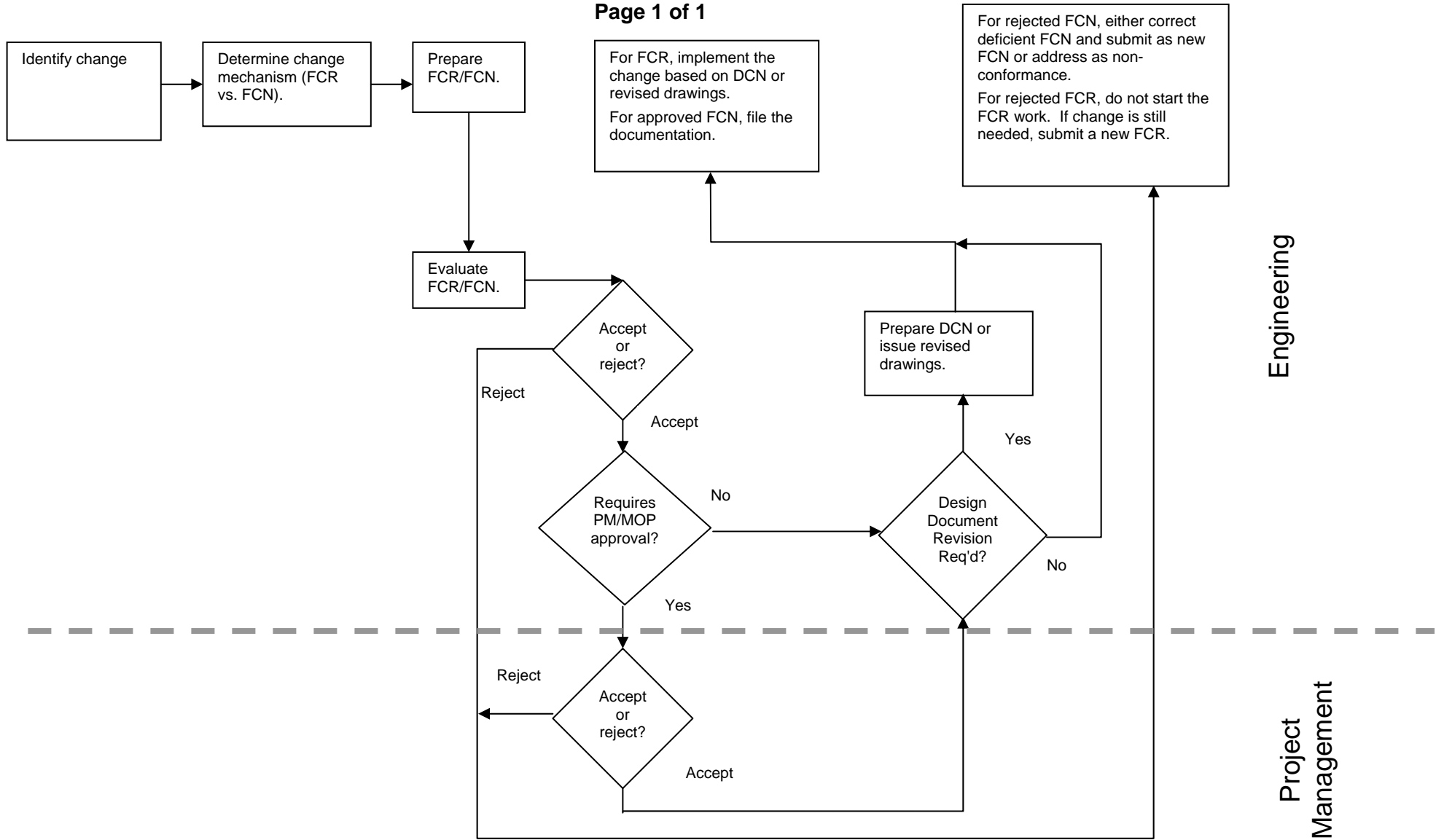
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Examples of potential FCNs include:

- Minor design changes needed to clear physical interference between incidental items.
- Correction of obvious drafting errors.
- Correction of a verifiable discrepancy on a design document when the correct data/configuration is provided on another document.
- Rerouting or relocation of incidental items.

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**Attachment C
FCR/FCN PROCESS
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**Form WCE-F-0045
FIELD CHANGE REQUEST (FCR) / FIELD CHANGE NOTICE (FCN)**

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This is an only an example of the form. See Document Control Center for usable form.



**Field Change Request (FCR) / Field Change Notice (FCN)
Completion Instructions**


-
1. Enter the FCR/FCN number assigned by the Engineering Manager.
 2. Enter the page number and total number of pages (i.e., Page 1 of 2, 2 of 2, etc.) of the FCR/FCN.
 3. Enter the project name.
 4. Enter the FCR/FCN Title.
 5. Provide a list of all documents affected by the proposed change. The list shall include Reference Document Number, Revision Number and Title of Document.
 6. Identify the reason for initiating the change in the "Reason for Change" section.
 7. Provide a detailed description of the existing condition and issue in the "Existing Condition" section (photo is recommended, if possible).
 8. Provide a detailed description of the proposed change or an alternative solution. Describe in writing and/or pictorially the proposed field change in the "Description of Change" section. If additional space is required, use the FCR/FCN Continuation Sheet.
 9. Field Engineer (FE), enter a reasonable date that Engineering is requested to complete disposition of the FCR/FCN in the "Requested Disposition" date field.
 10. FE and Front Line Supervisor signs and dates in the signature block.

NOTE: Refer to procedure section 3.3 for the Review & Approval Process for FCRs & FCNs.

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**Form WCE-F-0045
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	Field Change Request (FCR) /Field Change Notice (FCN)		
	FCR/FCN Number:	Page 1 of	
Project Name:			
FCR/FCN Title:			
Documents Affected by this FCR/FCN			
Document Number	Revision	Document Title	
Reason for Change:			
Existing Condition:			
Description of Change:			
Requested Date of FCR Disposition:			
Field Engineer		Front Line Supervisor	Date
Following to be completed by Engineering			
FCR Approved:		FCR/FCN Incorporation Required:	
Yes <input type="checkbox"/>	No <input type="checkbox"/> (see remarks)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Engineer/SME (include date)	Engineering Manager (include date)	Project Manager (if required, include date)	Facility Manager (include date)
Remarks:			

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FCR / FCN Continuation Sheet

FCR/FCN Number _____

Page _____ **of** _____ **Date** _____ **Project Name:** _____

Reason for Change (Continued)

Existing Condition (Continued)

Description of Change (Continued)


Remarks (Continued)

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**Form WCE-F-0054
DESIGN CHANGE NOTICE (DCN)**

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	DESIGN CHANGE NOTICE (DCN)		(1) PAGE 1 OF
	INSTRUCTIONS		(2) DCN NO.
(3) DRAWING NO.	(4) REV NO.	(5) DESIGN TITLE	
(6) REASON FOR CHANGE			
(7) OTHER DOCUMENTS AFFECTED BY THIS CHANGE			
(8) DESCRIPTION OF CHANGE			
DCN FORM INSTRUCTIONS			
(1)	PAGE NUMBER AND TOTAL NUMBER OF PAGES		
(2)	DCN NUMBER		
(3)	DRAWING NUMBER		
(4)	REVISION NUMBER OF DRAWING		
(5)	DESIGN TITLE		
(6)	REASON FOR CHANGE. AS APPLICABLE, IDENTIFY ORIGINATING REQUEST.		
(7)	OTHER DOCUMENTS THAT ARE AFFECTED (e.g., specifications, calculations, etc.)		
(8)	DETAILED DESCRIPTION OR SKETCH OF CHANGE. USE CONTINUATION SHEETS AS NECESSARY		
(9)	SIGNATURE OF THE ORIGINATOR		
(10)	SIGNATURE OF THE CHECKER		
(11)	DCN ISSUE DATE		
SIGNATURES (REVIEWS AND APPROVALS)			
(9) ORIGINATOR	(10) CHECKER	DATE (11)	

OWNER: Engineering	PRS-WCE-0027
TITLE: FIELD CHANGE REQUEST (FCR), FIELD CHANGE NOTICE (FCN), AND DESIGN CHANGE NOTICE (DCN) PROCESS	REV. NO. 0
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**Form WCE-F-0054
DESIGN CHANGE NOTICE (DCN)**

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This is an only an example of the form. See Document Control Center for usable form.

	DESIGN CHANGE NOTICE (DCN)		PAGE 1 OF
			DCN NO.
DRAWING NO.	REV NO.	DESIGN TITLE	
REASON FOR CHANGE			
OTHER DOCUMENTS AFFECTED BY THIS CHANGE			
DESCRIPTION OF CHANGE			
SIGNATURES (REVIEWS AND APPROVALS)			
ORIGINATOR	CHECKER	DATE	