CRD O 227.1  (Supplemented Rev. 0)  Title: Independent Oversight Program

Applicable Contractor(s):  RCC  X  OccMed  X  PRC  X  MSC  X  Other  

Section A – Headquarters CRD:
Hardcopy of the CRD text attached

Section B – General Clarifications: None

Section C – Specific Clarifications:
The supplemental requirements in Section D do not apply to actions involving safeguards and security, since equivalent implementation is accomplished through Security Directives.

Section D – General Supplemental Requirements
1. The contractor shall notify RL within one week of the following:
   a. When due dates are established for issues that require RL closure verification (issue tracking number to be included in notification). Any subsequent changes made to CAs and/or due dates shall also be communicated.
   b. When all CAs have been completed for an issue (concern, finding, observation, etc.) that requires RL closure verification or that no CAs are deemed necessary.

2. Contractor shall provide RL with documentation demonstrating closure for all completed CAs for issues designated as requiring RL closure verification, regardless of whether a CAP was requested. This documentation shall be at the issue level (Concern, Finding, or Observation).

3. For cases where RL requires a CAP (i.e., Cause Analyses /Corrective Action Plans) to be submitted, the following is required:
   a. For each issue designated by RL to be included in the CAP, a cause analysis (apparent or root) and corrective action plan using contractor approved formatting that:
      • Describes the issue,
      • Identifies contractor corrective action tracking number,
      • Identifies and discusses causes of the issue,
      • Identifies causal analysis method used,
      • Addresses the extent of condition,
      • Identifies the actions taken and/or to be taken to address the causes and prevent recurrence,
      • Identifies completion dates and responsible parties for each of the identified CAs,
      • Identifies what actions will be taken to verify/validate completion of CAs to provide assurance that CAs were appropriately implemented and effective at addressing the causes and preventing recurrence.
   b. Cause Analyses and associated CAPs shall be considered approved within 30 days of submittal to RL unless notified otherwise.
### Contractor Requirements Document (Supplemented) Form

- **NOTE:** Notifications identified in Item 1 above may be informal notification via e-mail.

- **NOTE:** Prior to completion of the analysis and corrective action plan for issues requiring RL closure verification, interface with the RL owner of the issue should occur to ensure full understanding of the issue and resolution.

- **NOTE:** Submission of closure documentation may be an informal transmittal

### Section E - Specific Supplemental Requirements:

NONE