Contractor Requirements Document
(Supplemented) Form

CRD O 232.2 (Supplemented Rev.0 )

Title: Occurrence Reporting and Processing of Operations Information

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

Section A – Headquarters CRD:
See DOE O 232.2, Attachment 1, 2, 3, 4, 5, and 6.

Section B – General Clarifications:

1) Attachment 1, Contractor Requirements Document, Section 3.c, Prompt Notification: The Facility manager (or delegate) shall notify the Facility Representative (FR) of all Significance Category (SC) 1, 2, 3, and 4 Reportable Occurrences as soon as practical (i.e. promptly), but no later than two hours after categorization. If the FR is not available, the On-Call FR shall be notified.

2) Attachment 2, Occurrence Reporting Criteria:

a) Section 6, Occurrence Reporting Criteria, Group 2 – Personnel Safety and Health, Subgroup E, Hazardous Electrical Energy Controls (2); and Subgroup F, Hazardous Energy Control (Other than electrical) (2): For the criteria work is considered to be authorized to begin when the associated work document has been released for work and zero-energy (safe condition and/or safe-to-work) checks have been completed.

b) Section 6, Occurrence Reporting Criteria, Group 2 – Personnel Safety and Health, Subgroup E, Hazardous Electrical Energy Controls (3); and Subgroup F, Hazardous Energy Control (Other than electrical) (3): “Any failure to follow a prescribed hazardous energy control process” is to be defined as a “Technical Errors” with the following definition:

Technical Error: A technical error is the failure to properly execute a hazardous energy control process requirement that could have resulted in hazardous energy being present, unidentified, in the work location but was prevented by other credited process controls (i.e., technical review, installation, verification, safe condition check, safe-to-work check).

c) Section 6, Occurrence Reporting Criteria, Group 6 – Contamination/Radiation Control, Subgroup A, Loss of Control of Radioactive Materials:

   i. Legacy contamination is defined as contamination not attributable to current operations.
   ii. Single short form reports shall be submitted on a not to exceed quarterly basis.

d) Section 6, Occurrence Reporting Criteria, Group 10, Management Concerns/Issues (3): Near miss occurrences require root cause analysis and corrective actions to prevent recurrence. This requirement can be waived by the FR on a case by case basis when the benefit of root cause analysis is not necessary to develop corrective actions to prevent recurrence and an
apparent cause determination is adequate.

3) Attachment 4, *Occurrence Reporting Model*:

a) A root cause determination shall be made for all SC-2, SC-1, SC-R, and Operational Emergencies Reportable Occurrences. This requirement can be waived by the FR on a case by case basis when the benefit of root cause analysis is not necessary to develop corrective actions to prevent recurrence and an apparent cause determination is adequate.

b) An apparent cause determination shall be made for all SC-3 Reportable Occurrences; and SC-4 Reportable Occurrences under Attachment 2, *Occurrence Reporting Criteria*, Section 6 Occurrence Reporting Criteria, Group 2 – Personnel Safety and Health, Subgroup E, Hazardous Electrical Energy Controls (3); and Subgroup F, Hazardous Energy Control (Other than electrical) (3).

### Section C – Specific Clarifications:

1) This section is applicable only to RCC, PRC, and MSC. The following are applicable to Attachment 4, *Occurrence Reporting Model*; Section 10, Identifying Safety Performance Trends and Recurring Occurrences that are submitted to DOE-RL:

a) Section 10 requires that each contractor must perform ongoing, but as a minimum quarterly, analyses of events during a 12 month period to look for trends. The quarterly performance analysis submitted to DOE-RL will include the trend analysis and any emergent or adverse trends identified.

b) Reports will cover three-month periods that end on November 30th, February 28th, May 31st, and August 31.

c) The Reports will be formally transmitted to DOE-RL 30 days after the report period identified in 1) b) above.

d) If a Recurring Report is identified after the period identified in 1) b) above but before the transmittal date of 1) c) above it will be included in the transmitted report.

### Section D – General Supplemental Requirements:

1) Facility Management shall notify the FR for all events such that real time notification of DOE line management occurs for personnel injuries, personnel radioactive contamination or internal deposition, chemical exposures, work stoppages, and any other situation that might receive public, regulatory, or DOE Headquarters attention. In addition, the FR shall be notified on a 24-hour basis of events that reach a threshold to notify the Facility Manager, to include non-reportable and adverse conditions. If Facility Management is unable to contact the FR, then the On-Call FR shall be notified. Specific criteria for notification shall be, but are not limited to, the following:
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a) Where employees:

1. Receive occupational injuries or are exposed to hazards that result in transport to first aid, a hospital, or cause the individual to be entered into a medical monitoring program.

2. Are unexpectedly exposed to hazardous substances (e.g., beryllium, asbestos, mercury, lead, etc) in excess of regulated limits, or unplanned IDLH conditions.

3. Receive skin or personal clothing contamination where decontamination is performed. Contractors shall distinguish between clothing contamination and skin contamination.

4. Have indications of radioactive internal deposition as verified by positive nasal smears, positive workplace monitoring results requiring follow-up (i.e. whole body count, bioassay), or other measured indication of a potential internal deposition.

b) When stop work is invoked for any safety related reason, either by workers or contractor management.

c) Whenever a situation is discovered that presents an imminent danger to workers, the environment, or the public or when it is determined such a condition was known to exist and was not mitigated.

d) Whenever any of the following barriers associated with determining isolation conditions for hazardous energy fail:

1. Tagout preparation

2. Technical Review

3. Installation

4. Verification

5. Safe Condition Check

6. Safe to Work Check

e) Any type of transportation incident/accident involving radioactive or hazardous materials.

f) Whenever any incident occurs that involves the potential loss of control or compromise of classified or nuclear material.

g) Whenever noncompliance with an environmental permit or requirement is identified and self-notification to a regulatory authority is planned.
2) For any SC-2, SC-1, SC-R, and Operational Emergencies Reportable Occurrences any proposed changes to corrective actions previously approved by the FR in ORPS (including completion dates) require FR approval. Minor administrative errors do not require approval (e.g., typographical errors).

3) At a minimum assess effectiveness to prevent recurrence for all SC-1, SC-R, and Operational Emergencies.

4) At a minimum document and independently verify corrective actions for SC-2, SC-1, SC-R, and Operational Emergencies Reportable Occurrences. Sampling may be performed for SC-2 reports.

5) FR approval is required for all Final SC-3 reports.

Section E - Specific Supplemental Requirements:

2) This section is applicable only to RCC, PRC, and MSC. The following are applicable to the Identifying Safety Performance Trends and Recurring Occurrences Report transmitted to DOE-RL:

a) For new ORPS “R” reports generated as result of the quarterly reviews; include the corrective actions taken, and the implementation status.

b) List the events (ORPS and others) that support an identified recurrence report. The list shall include the ORPS reference number, title, categorization date, and significant category. For non-ORPS events, the list shall include a title, brief description, and date of discovery or categorization.

c) Cite the associated lessons learned including the DOE Corporate Lessons Learned database assigned number. If lessons learned have not yet been submitted, indicate that they will be submitted and follow-up in the next Quarterly Report. Lessons learned submitted to the Corporate Lessons Learned database for recurring events shall include the associated ORPS event number in the Reference field.

d) Provide the status of corrective actions taken to address previous recurrent events until they are closed.

e) For recurrent events and negative trends from previous reports discuss the effectiveness of the corrective actions taken.

f) Provide the status of lessons learned developed until they are submitted to the DOE Corporate Lessons Learned database and provide the assigned reference number.