



STANFORD UNIVERSITY
SLAC National Accelerator Laboratory
 Operated by Stanford University for the U.S. Department of Energy



DOE Order 232.2A – Occurrence Reporting and Processing of Operations Information (Chg. 1)(MinChg)(10/04/2019)
Site Compliance Plan (final rev., 11/30/2020)

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Introduction

This Site Compliance Plan (SCP):

- a) corresponds with the version of the DOE Order on Occurrence Reporting and Processing of Operations Information listed in the Prime Contract,
- b) states how the Laboratory complies with applicable requirements as tailored to the risks at the Laboratory,
- c) identifies CRD sections that do not apply, and
- d) documents DOE-approved methods of compliance for applicable requirements and that there are no recurring deliverables*.

Impact on the Contract:

Under the SCP, sections of the CRD are incorporated into the Contract as-is, unless the SCP indicates that a section or portion thereof is inapplicable, or the section has been changed. Thus, for example, if “in compliance” is listed next to a CRD section, that section is incorporated into the Contract as-is. However, where an SCP indicates that a section or portion thereof is inapplicable, the section or portion thereof is excluded from the Contract. In addition, where a section or portion thereof is applicable, but changes to the section have been agreed by the Parties, the section, as modified by the Parties, shall be incorporated into the Contract. The SCP also memorializes the Parties’ agreement on how SLAC will comply with sections of the CRD (whether or not modified).

Contractor Requirements Document (CRD) – Attachment 1

CRD §	Requirements from CRD, Attachment 1	Compliance Status	Method of Compliance	Deliverables*			
				Item	Frequency	Due Date(s)	Recipient (e.g. BASO)
1.	GENERAL REQUIREMENTS						
1.a.	For reportable occurrences, contractors must categorize the occurrences, notify DOE as required, and prepare and submit Occurrence Reports. At sites with more than one facility management contractor, contractors may make arrangements for one of the contractors to prepare and submit reports for the entire site.	In compliance	Occurrences are called in to x5555 where Security provides emergency response as needed and notifies the on-call SLAC Duty Officer. The SLAC Duty Officer initially categorizes occurrences and ensures that appropriate notifications are made in accordance with the timelines shown in the Occurrence Reporting Model Chart below. The SLAC Contractor Assurance and Contract Management	n/a	n/a	n/a	n/a

*Deliverables: Data delivered to DOE or other external agency (e.g., external database entries)



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	However, each contractor must ensure that Occurrence Reports are submitted properly for activities within its scope of work.		Office (CACM) concur on all final categorizations. Reports are then submitted to the DOE Occurrence Reporting and Processing System (ORPS) database by CACM as described in this Site Compliance Plan (SCP). The SLAC Incident Reporting and Investigation Process document describes the process.				
1.b.	The documentation and distribution requirements must be satisfied by using DOE’s centralized unclassified operational database, the computerized Occurrence Reporting and Processing System (ORPS).	In compliance with approved changes.	SLAC enters Low (L) and Informational (I) Level events/conditions into ORPS when SLAC and BASO mutually determine that there are unique lessons learned opportunities that would benefit the DOE complex. In addition, SLAC will submit to ORPS all L and I Level injuries, illnesses, or exposures that constitute a violation of California Code of Regulations, Title 8. SLAC submits all High (H) Level events/conditions into ORPS. SLAC manages all abnormal events and conditions through the SLAC CAS, most notably through the Incident Reporting and Investigation Process document.	n/a	n/a	n/a	n/a
1.c.	Local implementing procedures may specify additional learning and reporting requirements beyond those stated in this CRD, but must at a minimum include all requirements of this CRD.	In compliance with approved changes.	The SLAC Incident Reporting and Investigation Process document contains the implementing procedures for incident reporting and investigation. <i>See also section 1.b</i>	n/a	n/a	n/a	n/a
2.	SECURITY REQUIREMENTS						
	Occurrence Reports containing classified or Controlled Unclassified Information must use procedures described in the Occurrence Reporting Model (Attachment 4).	Not Applicable	SLAC does not have any classified information, Unclassified Controlled Nuclear Information (UCNI), or other controlled information.	n/a	n/a	n/a	n/a
3.	SPECIFIC REQUIREMENTS						
3.a.	Event or Condition Identification and Response. (1) Identify abnormal or emergency conditions based on local processes and procedures that implement requirements of DOE O 422.1, Chg 2, <i>Conduct of Operations</i> , and DOE O 151.1D, <i>Comprehensive Emergency Management System</i> , dated 8-11-16.	In compliance with approved changes. NOTE: Orders 422.1 and 151.1D not applicable to	When an incident is reported to x5555, SLAC Security provides initial response, including emergency response, as necessary. The SLAC Duty Officer is notified by Security, and will then also participate in coordinating response and providing required notifications. Stabilization of operations is first priority of both Security and the SLAC Duty Officer, with reporting requirements not occurring until after the situation has been stabilized.	n/a	n/a	n/a	n/a

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	<p>(2) Ensure that the requirements of this CRD for reporting are initiated for events specified in the Occurrence Reporting Criteria (Attachment 2).</p> <p>(3) Ensure that reporting does not interfere with operations personnel taking appropriate actions to stabilize and/or place the facility/operation in a safe condition upon discovery of an abnormal event or condition.</p>	SLAC per BASO determination.	<p>The SLAC Incident Reporting and Investigation Process document and ESH Manual Chapter 37, Emergency Management, describe the process.</p> <p>Orders 422.1 and 151.D are not in the contract. Instead, SLAC follows these industry standards:</p> <ul style="list-style-type: none"> NFPA 1600, Standard On Continuity, Emergency, And Crisis Management NFPA 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments 				
3.b.	Event or Condition Categorization. Events and conditions must be categorized in accordance with the Occurrence Reporting Criteria (Attachment 2) and within the timeframes specified in the Occurrence Reporting Model (Attachment 4), or as soon thereafter as reasonably possible.	In compliance. Note that two Occurrence Reporting Criteria groups (described in Attachment 2 of DOE O 232.2) are not applicable to SLAC: 1) Group 3 – Nuclear Safety Basis; 2) Group 7 – Nuclear Explosive Safety.	<p>The on-call SLAC Duty Officer is notified by Security of any incidents reported to x5555, and the Duty Officer immediately initially categorizes the incident based on the information available at the time. The Duty Officer notifies SLAC management of any incidents categorized as meeting ORPS reporting criteria, and SLAC management notifies the BASO Duty Officer. As additional information becomes available, categorization is reconsidered. CACM concurs on all final categorizations.</p> <p>SLAC management notifies BASO of events and initial ORPS categorization (note that SLAC does not have any Facility Representatives (FR), therefore substitute BASO for FR throughout this SCP). If SLAC management cannot be reached by the Duty Officer within approximately 20 minutes of categorization, the Duty Officer provides notification of ORPS categorization to the BASO Duty Officer. For serious incidents (generally High (H) Level occurrences), SLAC targets producing a written internal status report within two hours of categorization. For less-serious incidents (generally Low (L) and Informational (I) Level occurrences), SLAC targets producing verbal/written notification within two business days of categorization.</p>	n/a	n/a	n/a	n/a

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3.c.	Occurrence Report Processing. Occurrence reports must be processed in accordance with the requirements outlined in the Occurrence Report Preparation (Attachment 3) and Occurrence Reporting Model (Attachment 4).	In compliance with approved changes.	<p>Once the Duty Officer determines that an incident meets ORPS reporting criteria, CACM ensures that appropriate reporting to the ORPS database occurs as described in this SCP and that BASO is notified in a timely manner, with the goal of consistently meeting the timelines shown in the Occurrence Reporting Model Chart below.</p> <p>SLAC enters Low (L) and Informational (I) Level events/conditions into ORPS when SLAC and BASO mutually determine that there are unique lessons learned opportunities that would benefit the DOE complex. In addition, SLAC will submit to ORPS all Low (L) and Informational (I) Level injuries, illnesses, or exposures that constitute a violation of California Code of Regulations, Title 8. SLAC submits all High (H) Level events/conditions into ORPS.</p> <p><i>See also section 1.b</i></p> <p>For all ORPS reports that will be submitted as described above, the goal is to consistently meet the timelines shown in the Occurrence Reporting Model Chart below.</p> <p>Per agreement with BASO, Facility Representative approval of High (H) Level reports is not required for SLAC. For High (H) Level final reports, SLAC Senior Management, in necessary coordination with CACM, provides final report approval. BASO concurs with submittal of the final report to ORPS and the report is closed in the ORPS database. The basis for this agreement is that SLAC manages all abnormal events/conditions through the SLAC CAS, most notably through the Incident Reporting and Investigation Process document.</p>	n/a	n/a	n/a	n/a

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3.d.	Occurrence Investigation and Analysis. Reportable occurrences must be investigated and analyzed in accordance with local procedures, as indicated in the Occurrence Reporting Model (attachment 4).	In compliance.	Once the SLAC Duty Officer determines that an incident meets ORPS reporting criteria, the event is managed via the Incident Reporting and Investigation Process and ORPS reports are entered into the ORPS database as described in this SCP. CACM ensures that line management investigates and analyzes the incident using the level of causal analysis described in the Incident Reporting and Investigation Process. <i>See also section 1.b</i>	n/a	n/a	n/a	n/a
4	RESPONSIBILITIES Facility Managers (as defined in this Order: see definition in Attachment 5). In addition to other requirements prescribed in this Order, Facility Managers are responsible for the following:						
4.a.	Ensure that procedures implemented for notification and reporting meet the requirements of this order.	In compliance	SLAC's Deputy Director of Operations (DDO) serves the role of Facility Manager as defined in this Order. The DDO relies upon CACM to ensure that the notification and reporting procedures described in the Incident Reporting and Investigation Process document meet the requirements of this order. <i>See sections 3.a, 3.b, and 3.c</i>	n/a	n/a	n/a	n/a
4.b.	Determine the causes and generic implications, and implement corrective actions and closeout activities for reportable functions.	In compliance with approved changes.	The DDO relies upon CACM to ensure that root and contributing causes of reportable occurrences are determined through investigation as described in the Incident Reporting and Investigation Process document, and corrective actions are developed and tracked in the SLAC Issues and Improvements Management System (SIIMS) as described in the Issues and Improvements Program document. <i>See section 3.d</i>	n/a	n/a	n/a	n/a

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4.c.	Review and assess reportable occurrence information for their facilities to assess generic implications and corrective action implementation, closeout, and effectiveness, as required; and to ensure that facility personnel involved in these operations perform the related functions.	In compliance	The SLAC Issues and Improvements Program document contains the implementing procedures for assessing generic implications and corrective action implementation, closeout, and effectiveness, as required; and to ensure that facility personnel involved in these operations perform the related functions. The DDO relies upon CACM to ensure implementation of the Issues and Improvement Program requirements.	n/a	n/a	n/a	n/a
4.d.	Ensure that Occurrence Reports and operations information from other organizations are disseminated to the appropriate facility personnel within their cognizance, are reviewed for generic implications, and are used to improve operations.	In compliance	The SLAC Issues and Improvements Program document and the SLAC Lessons Learned Program contain the implementing procedures to ensure appropriate dissemination of operations information, including occurrence reports and operations information from other organizations. The DDO relies upon CACM to ensure implementation of the Issues and Improvements Program and Lessons Learned Program requirements.	n/a	n/a	n/a	n/a
4.e.	Prepare and transmit Occurrence Reports in accordance with Order requirements.	In compliance	The DDO relies upon CACM to ensure that occurrence reports are prepared and transmitted as described in sections 1, 2, and 3.	n/a	n/a	n/a	n/a
5.	DEFINITIONS						

(end CRD)

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Occurrence Reporting Model Chart (from Attachment 4)

[This Attachment provides information and requirements applicable to DOE O 232.2A and contracts that include the associated CRD (Attachment 1 to DOE Order 232.2A).]

Significance Category	Timelines*	Prompt/Notification	Final Report Approval	Causal Analysis
High (H)	Categorize: 2 hours Initial Notification: 2 hours Written Notification: COB 2 business days Update/Final Report: COB 60 calendar days <i>See sections 1, 2 and 3 for associated categorization, timelines, notification, report submittal and approval, and causal analysis</i>	To BASO or Designated DOE Representative	By SLAC Senior Management with BASO concurrence	Per local procedures. Any identified causes and corrective actions must be included in the final report.
Low (L)	Categorize: 2 hours Initial Notification: 2 hours Written Notification/Final Report: 10 business days <i>See sections 1, 2 and 3 for associated categorization, timelines, notification, report submittal and approval, and causal analysis</i>	To BASO or Designated DOE Representative	By SLAC Senior Management with BASO concurrence	Per local procedures.
Informational (I)	Categorize: 2 hours Initial Notification: COB next business day Written Notification/Final Report: 10 business days <i>See sections 1, 2 and 3 for associated categorization, timelines, notification, report submittal and approval, and causal analysis</i>	To BASO or Designated DOE Representative	By CACM, as applicable, with concurrence from SLAC Senior Management and BASO	Per local procedures.

Notes:

- Categorization Time is no later than two hours from the Discovery Time.
- Initial Notification is from Categorization Date and Time.
- Written Notification (Occurrence Report) is from Categorization Date and Time.
- All time requirements are as listed or as soon thereafter as reasonably possible.
- Informational Level Reporting can be tailored per Program Office direction to only be captured in local issues management systems. Program Offices have the authority to determine which Informational Level Reports will be submitted to the ORPS database.



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Approvals

Name:	Title:	Signature:	Date:
Ken Fouts	Director, Contractor Assurance and Contract Management, SLAC		11/30/2020
Tom Rizzi	Division Director, Operations, BASO-SLAC		12/09/2020
Paul Golan	Head of Field Element, BASO-SLAC		12/9/2020

Please return signed document to Contract Management

Revision History

Revision	Revision Date	Summary of Change(s)
R0	11/30/2020	Original Release