



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 (01/17/2017)
Site Compliance Plan (final rev. 01/16/2018)

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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

Table with 4 main columns: CRD §, Requirements from CRD, Attachment 1, Compliance Status, Method of Compliance, and Deliverables* (managed through SLACTrak) with sub-columns for Item, Frequency, Due Date(s), and Recipient (e.g. SSO).

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



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CRD §	Requirements from CRD, Attachment 1	Compliance Status	Method of Compliance	Deliverables* (managed through SLACTrak)			
				Item	Frequency	Due Date(s)	Recipient (e.g. SSO)
	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 Issues Management Program (IMP) and accompanying Incident Report and Investigation Process documents describe 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 SSO 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 10 CFR 851. 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 IMP and accompanying Incident Report and Investigation Process documents.	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 IMP and accompanying Incident Report and Investigation Process documents contain 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.					
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	In compliance with approved changes. NOTE: Order 422.1 not	When an incident is reported to x5555, SLAC Security provides initial response, including emergency response, as necessary. FMD is notified by Security, and will then also participate in coordinating response and providing required notifications. Stabilization of operations is first priority of	n/a	n/a	n/a	n/a

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	151.1D, <i>Comprehensive Emergency Management System</i> , dated 8-11-16. (2) Ensure that the requirements of this CRD for reporting are initiated for events specified in the Occurrence Reporting Criteria (Attachment 2). (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.	applicable to SLAC per SSO determination.	both Security and FMD, with reporting requirements occurring until after the situation has been stabilized. The SLAC IMP and accompanying Incident Report and Investigation documents and ESH Manual 37, Emergency Management, describe the process.				
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.	The on-call FMD is notified by Security of any incidents reported to x5555, and the FMD immediately initially categorizes the incident based on the information available at the time. The FMD notifies SLAC management of any incidents categorized as meeting ORPS reporting criteria, and SLAC management notifies the SSO Duty Officer. As additional information becomes available, categorization is reconsidered. CACM concurs on all final categorizations. SLAC management notifies SSO of events and initial ORPS categorization (note that SLAC does not have any Facility Representatives, therefore substitute FR for SSO throughout this SCP). If SLAC management cannot be reached by FMD within approximately 20 minutes of categorization, FMD provides notification of ORPS categorization to SSO Duty Officer. For serious incidents, generally Operational Emergencies (OE) or H Level, SLAC targets producing a written internal status report within two hours of categorization. For non-serious incidents (generally L and I Level), SLAC targets producing verbal/written notification within two business days of categorization.	n/a	n/a	n/a	n/a
3.c.	Occurrence Report Processing. Occurrence reports must be processed in accordance with the requirements outlined in the Occurrence Report Preparation (Attachment	In compliance with approved changes.	Once the FMD 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 SSO is notified in a timely manner, with the goal of	n/a	n/a	n/a	n/a

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	3) and Occurrence Reporting Model (Attachment 4).		<p>consistently meeting the timelines shown in the Occurrence Reporting Model Chart below.</p> <p><i>See also section 1.b</i></p> <p>For submittal of final OE or H Level ORPS reports, the goal is to consistently meet the timelines shown in the Occurrence Reporting Model Chart below.</p> <p>Per agreement with SSO, Facility Representative and Program Manager approval of OE or H Level reports is not required for SLAC. For OE and H final reports, SLAC Senior Management, in necessary coordination with CACM, provides final report approval. SSO 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 IMP and accompanying Incident Report and Investigation Process documents.</p>				
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 with approved changes.	<p>Once the FMD determines that an incident meets ORPS reporting criteria, the event is managed via the IMP and accompanying Incident Report 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 appropriate level of causal analysis as described in the Occurrence Reporting Model Chart below.</p> <p><i>See also section 1.b</i></p>	n/a	n/a	n/a	n/a

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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 with approved changes.	See sections 3.a, 3.b, and 3.c	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.	See sections 3.d	n/a	n/a	n/a	n/a
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 IMP and accompanying Incident Report and Investigation Process documents contain the implementing procedures for all aspects of managing abnormal events/conditions, including 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.	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 IMP 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.	n/a	n/a	n/a	n/a
4.e.	Prepare and transmit Occurrence Reports in accordance with Order requirements.	In compliance with approved changes	See 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 SSO or Designated DOE Representative	By SLAC Senior Management with SSO 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 SSO or Designated DOE Representative	By SLAC Senior Management with SSO 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 SSO or Designated DOE Representative	By CACM, as applicable, with concurrence from SLAC Senior Management and SSO	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:
Marc E. Clay	Director, Contractor Assurance and Contract Management, SLAC	<i>Marc E. Clay</i>	<i>1-16-18</i>
Tom Rizzi	ES&H & Facilities Lead, SSO	<i>Thomas V. Rizzi</i>	<i>01-16-2018</i>
Hanley Lee	Head of Field Element, SSO	<i>Hanley Lee</i>	<i>1-16-18</i>

Please return signed document to: Contract Management, MS 75

Revision History

Revision	Revision Date	Summary of Change(s)
R0	1/16/2018	Original Release