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Occurrence Reporting and Processing of Operations Information

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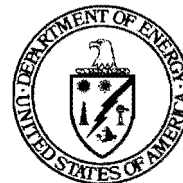
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PROCEDURE

**OCCURRENCE REPORTING AND PROCESSING OF
OPERATIONS INFORMATION**

LP-REG-017-OCRWM

Revision 0 ICN 0

Effective Date: 05/08/2006

Preparer:

[Redacted Signature]

M. Ruiz

5/04/06
Date

Approval:

[Redacted Signature]

W.J. Arthur, III
Director
Yucca Mountain Site Operations Office

5/04/06
Date

OCRWM

Type: Line Procedure

Procedure No.: LP-REG-017-OCRWM

Title: Occurrence Reporting and Processing of
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1.0 PURPOSE

This procedure establishes the Yucca Mountain Project (YMP) functional roles and responsibilities and provides a process for reporting occurrences related to YMP, for initiating timely corrective actions, and for reviewing trend analysis to prevent recurrence of issues in accordance with the U.S. Department of Energy (DOE) Manual 231.1-2, *Occurrence Reporting and Processing of Operations Information*. This procedure also complies with DOE O 231.1A, *Environment, Safety, and Health Reporting*, for the YMP.

This procedure defines how to accomplish the following:

- Establish the functional roles and responsibilities for the YMP Occurrence Report process
- Identify reportable conditions and events affecting YMP
- Notify appropriate management
- Process decisions and actions relative to the reportable occurrence
- Document the reportable occurrence and all relevant actions.

2.0 APPLICABILITY

This procedure applies to all DOE Office of Civilian Radioactive Waste Management (OCRWM) federal and direct support contractor and subcontractor personnel (YMP personnel) that work in OCRWM YMP owned/leased facilities. This procedure does not apply to the OCRWM Management and Operating Contractor (M&O) and subcontractor personnel, the U.S. Geological Survey, or the DOE National Laboratories. However, for the YMP, Ranch Control is to be informed or notified of all occurrences.

3.0 OTHER DOCUMENTS NEEDED/REFERENCES

- DOE O 151.1C, *Comprehensive Emergency Management System*
- DOE O 231.1A, *Environment, Safety, and Health Reporting*
- DOE O 5480.19, *Conduct of Operations Requirements for DOE Facilities*
- DOE G 231.1-1, *Occurrence Reporting and Performance Analysis Guide*
- DOE G 231.1-2, *Occurrence Reporting Causal Analysis Guide*
- DOE M 231.1-2, *Occurrence Reporting and Processing of Operations Information*
- AP-16.1Q, *Condition Reporting and Resolution*
- AP-16.4Q, *Causal Analysis and Corrective Action Plan Development*
- AP-17.1Q, *Records Management*

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- AP-SEC-001, *Identification, Protection, Distribution, and Use of Sensitive Unclassified Information*
- LP-PM-001-OCRWM, *OCRWM Self Assessment Program*
- LP-REG-010-OCRWM, *Managing Lessons Learned*
- DOE-NE-STD-1004-92, *Root Cause Analysis Guidance Document*
- DOE-STD-1045-93, *Guide to Good Practices for Notifications and Investigation of Abnormal Events*
- DOE-STD-1063-2000, *Facility Representatives*

4.0 RESPONSIBILITIES

- 4.1** The OCRWM Yucca Mountain Site Operations Office Director is responsible for the preparation, change, and maintenance of this procedure.
- 4.2** Program Managers (PMs), Facility Managers (FMs), and Facility Representatives (FRs) performing this procedure must complete LPSAF00-045 before performing the actions independently.
- 4.3** The following organizations or positions are responsible for activities identified in Section 5.0 of this procedure:
- a. PM (or Designee)
 - b. FM (or Designee)
 - c. FR (or Designee)
 - d. YMP Personnel

5.0 PROCESS

An overview of this process is depicted in the flowchart shown in Attachment 1, LP-REG-017-OCRWM Flowchart. Acronyms and abbreviations used in this procedure are defined in Attachment 2, Acronyms and Abbreviations. Terms used in this procedure are defined in Attachment 3, Definitions.

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5.1 IDENTIFYING AND DESIGNATING FUNCTIONAL ROLES AND RESPONSIBILITIES FOR YMP OCCURRENCE REPORTING

Note: The following steps do not need to be performed sequentially.

Note: LPSAF00-045 training needs to be completed before performing independently the steps outlined in this procedure.

PM (or Designee)

- [1] **Designate** an FM and any Facility Manager Designees (FMDs) for DOE owned/leased facilities at locations other than Yucca Mountain; that are not managed, operated, or leased by the M&O; and that are not governed by other DOE compliant occurrence reporting systems.
- [2] **Designate** an FR and Facility Representative Designees (FRDs) for the DOE owned/leased facility identified in Step 5.1 [1].
- [3] **Notify** the Operational Event Information Systems Manager of the listings of FM, FMDs, FRs, FRDs, PM, and Program Manager Designees (PMDs), as appropriate, **AND request** computer access codes for them as required.
- [4] **Review AND update** this information as required.

FM (or Designee)

- [5] **Define** any unique and specific requirements that apply to assigned facilities.
- [6] **Ensure** that necessary Occurrence Reporting and Processing System (ORPS) personnel are trained on the proper implementation of this procedure.
- [7] **Coordinate** with the PMD for training requirements.

5.2 OCCURRENCE IDENTIFICATION AND RESPONSES

Note: An FM or FMD will be available at all times to carry out the responsibilities for the categorization, notification, and reporting requirements.

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Note: Under no circumstance will Occurrence Reports containing classified information be entered into the ORPS database.

5.2.1 Event or Condition Identification and Response

Note: Occurrences may be identified by direct observation of equipment or process malfunctions, log or record reviews, operator recognition of errors, or other means.

YMP Personnel

- [1] **IF** the event is life threatening (injuries, fire, other emergency),
THEN dial 911 to summon emergency services.
- [2] **Notify** the Emergency Response personnel in the building or facility.
- [3] **Notify** the appropriate line management, FM, and Ranch Control at 295-5915 of the event status.
- [4] **Enter** the event into the Corrective Action Program in accordance with AP-16.1Q.

5.2.2 Event or Condition Categorization

FM (or Designee)

- [1] **Categorize** all ORPS reportable events or conditions within two hours of identification using DOE M 231.1-2, Section 6, Reporting Criteria.
- [2] **IF** an occurrence is categorized as an Operational Emergency,
THEN notify the DOE FR and the DOE Headquarters (HQ) Operations Center (OC) within 15 minutes.

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5.2.3 DOE Headquarters Operations Center Prompt Notifications

Note: DOE O 151.1C provides the requirements for the prompt and follow-up notifications to DOE and other agencies, and the appropriate emergency responses to be taken.

FM (or Designee)

- [1] **Notify** the DOE FR and the DOE HQ OC of the following reportable occurrences as soon as practical, but no later than two hours after categorization.
 - a. **Notify** the FR and the DOE HQ OC of Significance Category 1 occurrences.
 - b. **Notify** the FR and, if directed by the FR, the DOE HQ OC of Significance Category 2 occurrences.
 - c. **Notify** the FR of Significance Category 3 occurrences.
 - d. **Notify** the FR and the DOE HQ OC of those Significance Category 2, 3, and 4 occurrences shown with an asterisk in the reporting criteria in Section 6.3 of DOE M 231.1-2.
- [2] **Send** the prompt notification of the reportable occurrence to the DOE HQ OC via electronic mail (doehqoc@oem.doe.gov) **AND follow** up with a telephone call (202-586-8100) to ensure receipt of the electronic mail.
 - a. **State** clearly the Significance Category (1, R, 2, 3, or 4) **AND identify** the specific reporting criteria associated with the occurrence.
 - b. **Include** the following information in prompt notifications:
 - Occurrence Significance Category
 - Location and description of the event
 - Date and time of discovery
 - Damage and casualties
 - Impact of event on other activities and operations
 - Protective actions taken or recommended
 - Weather conditions at the scene
 - Level of media interest at scene/facility/site
 - Other notifications made.
- [3] **IF** the notification to DOE may contain classified or sensitive information, **THEN follow** Section 7 of DOE M 231.1-2 and AP-SEC-001.

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[4] **Provide** follow-up notifications to the DOE upon further degradation in the level of safety or impact on the environment, health or operations of the facility, or other worsening conditions.

[5] **IF** the occurrence is recategorized,

THEN reconsider the occurrence for prompt notification.

5.2.4 Written Notification Report

FM (or Designee)

[1] **Prepare** the written notification report using the format provided in DOE G 231.1-1, including all required fields and all other fields in which information is known.

Note: Direct entry into the computerized ORPS database satisfies the written distribution requirements.

[2] **Distribute** the written report to the FR and PM (or Designees) according to the following schedule:

- a. **Submit** reports for Operational Emergencies and Significance Category 1 Occurrences before close of the next business day from time of categorization (not to exceed 80 hours).
- b. **Submit** reports for Significance Category R and 2 Occurrences before close of the next business day from the time of categorization.
- c. **Submit** reports for Significance Category 3 Occurrences no later than close of business on the second business day from the time of categorization.
- d. **Submit** the Short Form Reports for Significance Category 4 Occurrences by close of business the second business day from the time of categorization **AND send** a hard copy to the YMP Information Center (Las Vegas).

[3] **WHEN** event conditions change that require a revised Significance Category,

THEN submit an updated report within the timeframe required under the new Significance Category that contains the following information:

- The new Significance Category

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- Changes in the reporting criteria of the occurrence.

[4] **Include** a discussion of the change in categorization in the Description of Occurrence field in the Update Report.

5.2.5 Occurrence Investigation and Analysis

Note: DOE O 5480.19 and DOE-STD-1045-93 should be considered when investigating occurrences. The investigative process is used to gain an understanding of the occurrence, its causes, and the corrective actions necessary to prevent recurrence or only remedy the problem, based on the significance of the occurrence.

FM (or Designee)

[1] **Investigate** the occurrence per AP-16.1Q and AP-16.4Q.

Note: DOE G 231.1-2 provides guidance on selecting the appropriate cause code and including information in report fields. AP-16.4Q provides guidance for developing cause codes and corrective actions.

Note: The graded approach is based on the significance, severity, or risk associated with the event or condition in accordance with DOE M 231.1-2.

[2] **Use** the graded approach described in the Occurrence Reporting Model when determining the level of effort required for the investigation into the causes of the occurrence.

[3] **Include** all causes as required in the Occurrence Reporting Model in the Occurrence Report.

[4] **Include** the methodology used in the Cause Description field of the Occurrence Report.

[5] **Identify** any weaknesses in the implementation of the Integrated Safety Management Program **AND** enter them into the Integrated Safety Management field.

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[6] **WHEN** there is any significant and new information pertaining to reported occurrences except for Significance Category 4 occurrences,

THEN submit an updated report that includes the following:

- The status of the investigation
- Recurring consequences
- Additional component defects associated with the occurrence.

5.2.6 Occurrence Report Closure

FM (or Designee)

[1] **Submit** the Final Report as soon as practical, but within 45 calendar days after initial categorization of the occurrence.

[2] **Include** the following:

- The significance, nature, and extent of the event or condition
- The cause of the event or condition using the apparent cause codes
- The immediate actions taken and the corrective action(s) to be taken as required by the Occurrence Reporting Model
- Any identified lessons learned.

[3] **IF** an accident investigation was performed,

THEN include the methodology used in the Cause Description field of the Occurrence Report.

FR (or Designee)

[4] **Review** the report within 14 calendar days after receipt of Operational Emergencies and Significance Category 1, R, and 2 reports **AND take** one of the following actions:

- a. **Approve.**
- b. **Approve** with comments.
- c. **Disapprove.**

[5] **IF** the Final Report is not approved,

THEN provide the reason for disapproval in the comment section of the report.

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PM (or Designee) [6] **IF** the occurrence is an Operational Emergency or a Significance Category 1 occurrence,

THEN review the Final Report within 14 calendar days after the FR has approved it **AND take** one of the following actions:

- a. **Approve.**
- b. **Approve** with comments.
- c. **Disapprove.**

[7] **IF** the Final Report is not approved,

THEN provide the reason for disapproval in the comment section of the report.

FM (or Designee) [8] **IF** the Final Report was not approved by the FR or PM,

THEN submit a revised Final Report within 21 calendar days of the disapproval.

[9] **IF** the revised Final Report cannot be submitted within this time frame,

THEN submit an Update Report within 21 calendar days explaining the delay and providing an estimated date for resubmittal of the Final Report.

Note: Entering the Occurrence Report in the ORPS database automatically satisfies the distribution requirement.

[10] **Distribute** the Occurrence Reports (updates and finals) as soon as practical to the following:

- FR
- PM
- Affected program self-assessment group.

[11] **Send** a hard copy of all unclassified, nonsensitive Final Reports, with the exception of final cancelled reports, to the YMP Information Center (Las Vegas) within one week of final approval.

[12] **Track** all corrective actions to closure, including independent verification or sampling at the facility level as prescribed in the Occurrence Reporting Model and AP-16.1Q.

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[13] **WHEN** a root cause was performed,

THEN evaluate the effectiveness of the corrective actions to prevent recurrence.

Note: The Corrective Action Program **MUST** include management of Significance Category 4 occurrences, whose corrective actions are not managed through ORPS.

Note: AP-16.1Q provides guidance on Condition Reports.

[14] **Enter** the Condition Report number(s) that will track the corrective actions locally into the ORPS database.

[15] **Submit** final Occurrence Reports to the RPC in accordance with Section 6.0.

5.2.7 Short Form Reports

Note: The Short Form report satisfies all of the written reporting requirements for Significance Category 4 occurrences.

Note: DOE G 231.1-1 provides guidance on preparing Short Form Reports.

FM (or Designee)

Prepare Short Form Reports for Significance Category 4 occurrences no later than two business days after categorization of the occurrence.

5.2.8 Performance Analysis and Identification of Recurring Occurrences

FM (or Designee)

[1] **Review** trend reports and recurring event reports.

[2] **Submit** a new Occurrence Report for notification of the recurring issue, with investigation, root cause analysis, and corrective actions subsequently required.

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- [3] **Include** previous individual Occurrence Report Numbers associated with the recurring issue, if applicable.
- [4] **Select** the appropriate reporting criteria associated with the recurring issue.
- [5] **IF** no specific reporting criteria can be identified,
THEN list the reporting criteria as Group 10, Criteria #2.

Note: DOE G 231.1-1 provides guidelines on recurring occurrences.

- [6] **Categorize AND report** recurring occurrences as a Significance Category R, even if each individual occurrence had been originally categorized at a higher or lower significance level.

5.2.9 Periodic Reporting

PM (or Designee)

Conduct annual self-assessments of YMP's compliance with the objectives and timeframes contained in DOE M 231.1-2 per LP-PM-001-OCRWM.

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6.0 RECORDS

The records listed in Subsection 6.2 shall be collected and submitted to the RPC in accordance with AP-17.1Q as individual records or included in a records package, as specified.

6.1 QA RECORDS

None

6.2 NON-QA LONG-TERM RECORDS

Individual Records:

- DOE FR designation
- Facility and FM designations
- Final Report for each reportable incident
- E-mail notifications of Reportable Occurrences

Records to be submitted per LP-PM-001-OCRWM:

- Annual Occurrence Reporting Process Self Assessments

Records to be submitted per AP-16.1Q and AP-16.4Q:

- Occurrence Investigation and/or Analysis Documents

6.3 NON-QA SHORT-TERM RECORDS (THREE YEARS OR LESS RETENTION)

None

7.0 ATTACHMENTS

The change history for this procedure is included as Attachment 5, Change History.

- 1 LP-REG-017-OCRWM Flowchart
- 2 Acronyms and Abbreviations
- 3 Definitions
- 4 Occurrence Reporting Model
- 5 Change History

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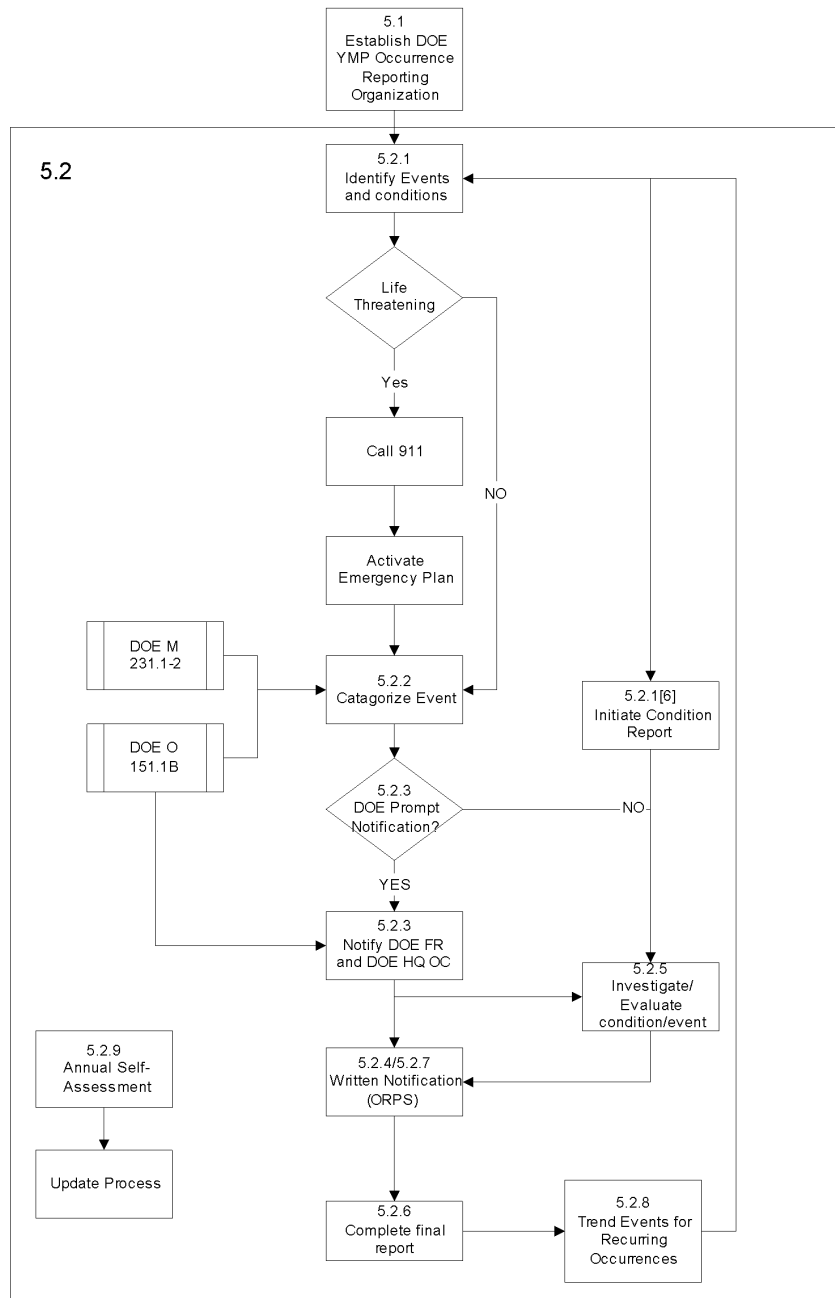
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Attachment 1

LP-REG-017-OCRWM Flowchart



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Attachment 2

Acronyms and Abbreviations

DOE	U.S. Department of Energy
FM	Facility Manager
FMD	Facility Manager Designee
FR	Facility Representative
FRD	Facility Representative Designee
HQ	Headquarters
M&O	Management and Operating Contractor
OC	Operations Center
OCRWM	Office of Civilian Radioactive Waste Management
ORPS	Occurrence Reporting and Processing System
PM	Program Manager
PMD	Program Manager Designee
RPC	Records Processing Center
YMP	Yucca Mountain Project

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Attachment 3

Definitions

Business Day—The normal administrative day of the reporting organization (e.g., Monday through Friday, 0800 to 1700), during which normal work activities are conducted. It is not meant to encompass the 24-hour day, even if the facility is operated or maintained on a 24-hour basis.

Condition—Any as-found state, whether or not resulting from an event, that may have adverse safety, health, quality assurance, operational, or environmental implications. A condition is usually programmatic in nature. For example, errors in analysis or calculation, anomalies associated with design or performance, or items indicating a weakness in the management process are all conditions.

DOE Facility Representative (FR)—For each DOE/YMP owned/leased major facility or group of lesser facilities, a DOE employee or designee assigned responsibility by the Head of the Field Organization for monitoring the performance of the facility and its operations. This individual shall be the primary point of contact with the contractor and will be responsible to the appropriate Program Secretarial Officer and Head of Field Organization for implementing the requirements of this procedure. The Yucca Mountain Site Operations Office Director has been delegated Head of Field Organization responsibilities.

Emergency—An emergency is the most serious occurrence and requires an increased alert status for on-site personnel and, in specific cases, for off-site authorities. DOE O 151.1C defines the types of occurrences that are to be categorized as emergencies.

Event—Something significant and real-time that happens (e.g., pipe break, valve failure, loss of power, environmental spill, earthquake, tornado, flood).

Facility—Any equipment, structure, system, process, or activity that fulfills a specific purpose.

Facility Manager (FM)—The individual or designee, usually but not always a contractor, who has direct line responsibility for operation of a facility or group of related facilities, including authority to direct physical changes to a facility.

Lessons Learned—A “good work practice” or innovative approach that is identified and shared, or an adverse work practice or experience that is shared to avoid recurrence.

Nonreportable Event—An event that falls within the ORPS Reporting Groups, does not exceed any of the specific ORPS Reporting Criteria, and the reporting organization has determined to be included in the required ORPS Performance Analysis activity.

Notification Report—The initial documented report to the DOE of an event or condition that meets the reporting criteria defined in this procedure. The Notification Report shall be completed according to instructions outlined in DOE M 231.1-2.

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Attachment 3

Definitions (Continued)

Occurrence—One or more (i.e., recurring) events or conditions that adversely affect, or may adversely affect, DOE (including the National Nuclear Security Administration) or contractor personnel, the public, property, the environment, or the DOE mission. Events or conditions meeting the criteria thresholds identified in DOE M 231.1-2 or determined to be recurring through performance analysis are occurrences.

Occurrence Investigation—An investigation conducted according to site-specific procedures and/or when determined by DOE procedures that a Type A or B investigation is required.

Occurrence Report—A documented evaluation of an event or condition that is prepared in sufficient detail to enable the reader to assess its significance, consequences, or implications and to evaluate the actions being proposed or employed to correct the condition or to avoid recurrence.

Occurrence Reporting and Processing System (ORPS)—A system for reporting operations information related to DOE owned/leased facilities.

Program Manager (PM)—The HQ individual or designee, designated by and under the direction of a Secretarial Officer, who is directly involved in the operation of facilities under his or her cognizance, and holds signature authority to provide technical direction to operating personnel for these facilities. The Yucca Mountain Site Operations Office Director has been delegated PM responsibilities. He may appoint several PMDs.

Prompt Notification—Timely reporting of an occurrence to the DOE Field Office and the DOE HQ OC as required by the Significance Category and the reporting criteria of the occurrence.

Ranch Control—The field-controlling agency for access, security, communications, and reporting of events and activities for YMP. YMP Site Operations is located at the Exploratory Studies Facility of Area 25 of the Nevada Test Site.

Reportable Occurrence—Occurrence to be reported in accordance with the criteria defined in DOE M 231.1-2, except as follows: If local or state governmental thresholds are lower, the lower threshold shall control; If the incident involves a member of the public, it shall be reported as an occurrence regardless of thresholds; If the incident involves an actual or potentially significant impact on the environment, it shall be reported as an occurrence regardless of thresholds.

Site Operations Occurrence Reporting and Processing System (ORPS) Coordinator—The individual responsible for developing trend or other reports using ORPS data.

Yucca Mountain Project (YMP) Personnel—DOE federal employees and OCRWM direct support contractor and subcontractor personnel. Does not include M&O and its subcontractor personnel, or U.S. Geological Survey personnel.

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Attachment 4

Occurrence Reporting Model

Significance Category	Timelines ¹	Prompt Notification	Investigation	Causal Analysis	Corrective Actions	Report Approvals	Corrective Action Closures	Corrective Action Effectiveness	Lessons Learned ³
Operational Emergencies (defined by DOE O 151.1B)	Cat: ASAP PN: NLT 15 min if further classified; NLT 30 min if not further classified WN: COB next business day not to exceed 80 hrs UR: As needed FR: 45 days	DOE Facility Representative & DOE Operations Headquarters Center (OC)	Team with Trained Investigator. DOE Consider Accident Investigation.	Root Cause Determined	Remedy Problem, Prevent Recurrence, & Preclude Similar Problems	DOE Facility Representative & DOE Program Manager Approval	Document & Independently Verify	Assess Effectiveness to Prevent Recurrence	Enter into DOE LL Database & Coverage in OE Summary
Significance Category 1 Reportable Occurrence	Cat: NLT 2 hrs PN: NLT 2 hrs WN: COB next business day not to exceed 80 hrs UR: As needed FR: 45 days	DOE Facility Representative & DOE Headquarters OC	Team with Trained Investigator. DOE Consider Accident Investigation.	Root Cause Determined	Remedy Problem, Prevent Recurrence, & Preclude Similar Problems	DOE Facility Representative & DOE Program Manager Approval	Document & Independently Verify	Assess Effectiveness to Prevent Recurrence	Enter into DOE LL Database & Coverage in OE Summary
Significance Category 2, 3, and/or 4 Reportable & Nonreportable Occurrences	Cat: NLT 2 hrs PN: COB next business day UR: As needed FR: 45 days		Trained Investigator	Root Cause Determined	Remedy Problem, Prevent Recurrence, & Preclude Similar Problems	DOE Facility Representative Approval	Document & Independently Verify	Assess Effectiveness to Prevent Recurrence	Enter into DOE LL Database & Coverage in OE Summary
Significance Category 2 Reportable Occurrence	Cat: NLT 2 hrs PN: NLT 2 hrs WN: COB next business day UR: As needed FR: 45 days	DOE Facility Representative (DOE HQ OC at Field Office Discretion) ²	Trained Investigator	Apparent Cause Determined	Remedy Problem & Prevent Recurrence	DOE Facility Representative Approval	Document & Verify by Sampling	Optional	Enter into DOE LL Database & Coverage in OE Summary
Significance Category 3 Reportable Occurrence	Cat: NLT 2 hrs PN: NLT 2 hrs WN: NLT 2 business days UR: As needed FR: 45 days	DOE Facility Representative (DOE HQ OC) ²	Critique/ Fact Finding	Apparent Cause Determined	Remedy Problem	Approval	Document (Verification Optional)	Optional	Per Site Specific Process
Significance Category 4 Reportable Occurrence	Cat: NLT 2 hrs PN: NLT 2 hrs (as required) Short Form Report: NLT 2 business days	(DOE Facility Representative & DOE HQ OC) ²	No reporting of causal analysis or lessons learned in ORFS. The reporting of corrective actions is optional. Reportable and nonreportable occurrences are managed per contractor-specific corrective action programs.						

¹Cat: Categorization Time from Discovery Date and Time
 PN: Prompt Notification from Categorization Date and Time
 WN: Written Notification from Categorization Date and Time
 UR: Update Report
 FR: Final Report from Categorization Date and Time

NLT: No Later Than
 COB: Close of Business
²Specific Significance Category 2, 3, and 4 occurrences (identified with an asterisk in the reporting criteria listed in Section 6 of DOE M 231.1-2) also require Prompt Notification to the DOE HQ OC.

³LL: Lessons Learned
 OE: Operating Experience

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Attachment 5**Change History**

<u>Revision Number</u>	<u>Interim Change No.</u>	<u>Effective Date</u>	<u>DESCRIPTION OF CHANGE</u>
0	0	05/08/2006	Initial issue as an Office of Civilian Radioactive Waste Management line procedure. Supersedes AP-REG-007, Rev 1, ICN 0.