

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
1	Chapter I	REPORTING ENVIRONMENTAL PROTECTION INFORMATION				
2	I.1.	<u>Environmental Protection Program Reporting</u>	-	-	-	Delete
3	I.1.a.	<u>Heads of Headquarters Elements and Heads of Field Elements</u> , for matters under their purview, must:	-	-	-	Delete
4	I.1.a.(1)	Ensure that the information needed to meet the requirements of DOE O 450.1, <i>Environmental Protection Program</i> , is reported annually considering annual guidance provided by the Chief Health, Safety and Security Officer as follows:			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
5	I.1.a.(1)(a)	Information on site progress in implementing Environmental Management Systems (EMSs).			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
6	I.1.a.(1)(b)	Information on site progress in reducing or eliminating the generation of waste, the release of pollutants to the environment,			Deleted environmental protection, energy and environmental sustainability program	Delete

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7 I.1.a.(1)(c)	and the use of Class I ozone-depleting substances (ODS). Site reporting must be accomplished utilizing the Web-based Pollution Prevention Performance Tracking and Reporting System.			reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
	Information on site procurement of recycled-content materials and environmentally preferable products and services. Site reporting must be accomplished utilizing the Web-based Pollution Prevention Performance Tracking and Reporting System.			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
8 I.1.a.(1)(d)	Information on pollution prevention award nominations from sites, and nominations selected as “best in class” by heads of Primary DOE Organizations. The Chief Health, Safety and Security Officer will submit the selected “best in class” pollution prevention awards to the White House “Closing the Circle” award competition. Site reporting must be accomplished utilizing the Web-based Pollution Prevention Performance Tracking and Reporting System.			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete

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9	I.2.	<u>ANNUAL SITE ENVIRONMENTAL REPORT</u>	4. a. <u>Reporting Annual Site Environmental Information (ASER)</u>	-	Modified title to be consistent with remainder of Directive in this section	Modify
10	I.2.a.	<u>Heads of Field Elements</u> will prepare an integrated Annual Site Environmental Report for each calendar year. This report must present summary environmental data in order to:	<p>Paragraph 4. <u>REQUIREMENTS</u> Reports must be submitted as follows:</p> <p>a. <u>Reporting Annual Site Environmental Information (ASER)</u>. Annual site environmental information must be reported in accordance with Attachment 2.</p> <p>-----</p> <p>Att 2</p> <p>REPORTING ANNUAL SITE ENVIRONMENTAL INFORMATION</p> <p><u>Annual Site Environmental Reporting</u>. The following information must be made available to the public, and submitted to the Chief Health, Safety and Security Officer by October 1 of each year for the preceding calendar year, developed in accordance with the most recent applicable guidance provided by the Chief, Health Safety and Security Officer and as directed by the Head of Headquarters Element or Head of DOE Field Element, and support partial or full preparation of the Annual Site Environmental Report (ASER):</p>	<p>Requirements section points to attachment which contains requirements that are common to DOE federal organizations and contractors.</p> <p>The data collected from ASER reports enable DOE to carry out its corporate function to analyze and compare programs across DOE and with the private sector. Enhanced analysis will enable DOE to identify trends and determine alternative approaches to manage costs and improve performance.</p> <p>ASERs provide important information for site managers and DOE-HQ to assess field environmental program performance, site-wide environmental monitoring and surveillance effectiveness, and confirm compliance with Federal and State’s environmental standards and requirements. They are also the means by which DOE sites demonstrate compliance with the radiation protection requirements of DOE Order 458.1, Radiation Protection of the Public and Environment. In addition, ASERs are an</p>	<p>Requirements section points to attachment which contains requirements that are common to DOE federal organizations and contractors.</p> <p>*****</p> <p>Modified language in original Chapter I, 2a (end of paragraph) to include paragraph b, added requirement to prepare ASER in accordance with guidance provided by HSS, which was implicit in original requirement, and clarified language. Concerted efforts are being made to streamline, prepare and release the annual ASER guidance by March of each calendar year. The intent of the guidance is not to require revision of ASERs but to supplement the requirements of DOE O 231.1B. In the event that HQ internal review and approval processes result in late release of the guidance, sites should</p>	Modify

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11	I.2.a.(1)	Characterize site environmental management performance. Include data on effluent releases, environmental monitoring, and estimated radiological doses to the public from releases of radioactive material at DOE sites.	Att 2 1. Site environmental management performance. Data must include effluent releases, environmental monitoring, and types and quantities of radioactive materials emitted or discharged to the environment, the estimated or calculated total effective dose to a representative person or maximally exposed member(s) of the public and the calculated collective dose to members of the public from exposure to radiation sources identified under DOE O 458.1, and, where it is of concern, releases of radon and its decay products from DOE sources and the resultant individual and collective dose from these radionuclides, which need not be combined with dose estimates from other sources.	important means of conveying DOE's environmental protection and sustainability performance to stakeholders and members of the public living near DOE sites. ASERs provide important information needed by site managers and DOE Headquarters to assess field environmental program performance, site-wide environmental monitoring and surveillance effectiveness, and confirm compliance with environmental standards and requirements. They are also the means by which DOE sites demonstrate compliance with the radiation protection requirements of DOE Order 458.1. In addition, ASERs are an important means of conveying DOE's environmental protection performance to stakeholders and members of the public living near DOE sites.	not be subject to modifying the ASER and expend unnecessary resources. Requirement to collect radiological exposure information was expanded to clarify what was required to be reported and to ensure consistency in reporting. The expanded changes in this paragraph also reflect changes that conform to revisions in DOE O 458.1.	Modify
12	I.2.a.(2)	Summarize environmental occurrences and responses reported during the calendar year (CY).	Att 2 2. Environmental occurrences and responses. Information must include a summary of environmental occurrences and responses reported during the calendar	ASERs provide important information needed by site managers and DOE Headquarters to assess field environmental program performance, site-wide environmental monitoring and	Clarified language.	Modify

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13	I.2.a.(3)	Confirm compliance with environmental standards and requirements.	<p>year.</p> <p>Att 2 3. Environmental compliance. Information must confirm compliance with environmental standards and requirements.</p>	<p>surveillance effectiveness, and confirm compliance with environmental standards and requirements. They are also the means by which DOE sites demonstrate compliance with the radiation protection requirements of DOE Order 458.1. In addition, ASERs are an important means of conveying DOE's environmental protection performance to stakeholders and members of the public living near DOE sites.</p> <p>ASERs provide important information needed by site managers and DOE Headquarters to assess field environmental program performance, site-wide environmental monitoring and surveillance effectiveness, and confirm compliance with environmental standards and requirements. They are also the means by which DOE sites demonstrate compliance with the radiation protection requirements of DOE Order 458.1. In addition, ASERs are an important means of conveying DOE's environmental protection performance to stakeholders and members of the public living near DOE sites.</p>	Clarified language.	Modify

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14	I.2.a.(4)	Highlight significant programs and efforts. Include environmental performance indicators and/or performance measures programs. The breadth and detail of this reporting should reflect the size and extent of programs at a particular site.	Att 2 4. Significant programs and efforts. Information must highlight significant environmental performance indicators and/or performance measures programs which reflect the size and extent of programs at a particular site.	ASERs provide important information needed by site managers and DOE Headquarters to assess field environmental program performance, site-wide environmental monitoring and surveillance effectiveness, and confirm compliance with environmental standards and requirements. They are also the means by which DOE sites demonstrate compliance with the radiation protection requirements of DOE Order 458.1. In addition, ASERs are an important means of conveying DOE's environmental protection performance to stakeholders and members of the public living near DOE sites.	Clarified language.	Modify
15	-	-	Att 2 5. Property clearance activities. Information must include a summary of approved Authorized Limits, results of radiological monitoring and surveys of cleared property, types and quantities of property cleared, and independent verification program results in accordance with DOE O 458.1.	This requirement strengthens DOE's ongoing efforts to improve public notification of clearance of property, and clarifies the types of accessible information on materials and equipment clearance to be incorporated into the ASER. Additionally, a January 19, 2001, Secretarial memorandum recognized the need to improve radiation monitoring, independent verification, and record keeping and reporting, and also to help the public better understand DOE's	This requirement strengthens DOE's ongoing efforts to improve public notification of clearance of property, and clarifies the types of accessible information on materials and equipment clearance to be incorporated into the ASER. Additionally, a January 19, 2001, Secretarial memorandum recognized the need to improve radiation monitoring, independent	New

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16	I.2.a.	The Annual Site Environmental Report for the calendar year will be completed and made available to the public by October 1 of the following year and will be submitted to the Chief Health, Safety and Security Officer at that time.	release practices. Noting that DOE directives already required annual site environmental reports to contain information on DOE releases of radioactive material and potential doses to the public, the Secretary directed Field Office Managers to ensure that they include information on the authorized limits being used at their facilities, and surveys and independent verification program results in the site's annual environmental reports.	verification, and record keeping and reporting, and also to help the public better understand DOE's release practices. Noting that DOE directives already required annual site environmental reports to contain information on DOE releases of radioactive material and potential doses to the public, the Secretary directed Field Office Managers to ensure that they include information on the authorized limits being used at their facilities, and surveys and independent verification program results in the site's annual environmental reports.	Merge

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17	I.2.b.	The Office of Corporate Safety Analysis will continue to issue annual guidance to all DOE Headquarters and field elements regarding the preparation of the Annual Site Environmental Reports.			This is a responsibility. Added as an HSS responsibility.	Delete
18	I.3.	<u>NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REPORTING</u>			This requirement is contained in paragraph 4.g of DOE O451.1B, Change 2, dated 6-25-10. Delete from DOE O 231.1B to avoid redundancy.	Delete
19	I.3.a.	<u>Heads of Headquarters and Field Elements</u> with responsibility for NEPA matters, will (subject to the exclusion of the Naval Nuclear Propulsion and the special provisions for the National Nuclear Security Administration described in DOE O 451.1B):			This requirement is contained in paragraph 4.g of DOE O451.1B, Change 2, dated 6-25-10. Delete from DOE O 231.1B to avoid redundancy.	Delete
20	I.3.a.(1)	Submit an annual report to the Office of NEPA Policy and Compliance on progress in implementing, and the effectiveness of, any commitment for environmental impact mitigation that is essential to render the impacts of a proposed action not significant or that is made in a record of decision. The report may be submitted on the mitigation action plan anniversary or as part of a combined report (for			This requirement is contained in paragraph 4.g of DOE O451.1B, Change 2, dated 6-25-10. The last sentence is not a requirement, but a responsibility, and is found in paragraph 5.d(10)(f) of DOE O 451.1B. Delete from DOE O 231.1B to avoid redundancy.	Delete

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	example, as part of the annual NEPA planning summary) for multiple plans until mitigation has been completed.					
21	I.3.a.(2)	Submit an annual NEPA planning summary to the General Counsel (GC-1) by January 31 of each year and make it available to the public. The current version of DOE O 451.1B, <i>National Environmental Policy Act Compliance Program</i> , describes the contents of the annual NEPA planning summary.			The first sentence is a responsibility, and is found in paragraph 5a(7) of DOE O451.1B, Change 2, dated 6-25-10. The last sentence is a requirement, found in paragraph 4d of DOE O 451.1B. Delete from DOE O 231.1B to avoid redundancy.	Delete
22	Chapter II.	REPORTING OCCUPATIONAL SAFETY AND HEALTH INFORMATION				
23	II.1.	<u>INJURY AND ILLNESS RECORDKEEPING AND REPORTING</u> . It is DOE policy that environmental, safety, and health reports be complete and readily available for authorized dissemination outside the cleared community. When accidents or incidents occur in Unclassified Controlled Nuclear Information (UCNI) sensitive facilities and/or involve classified operations, the local classification officer will be consulted to verify that such reports do not inadvertently disclose classified or unclassified controlled	Main Body of Order 4. <u>REQUIREMENTS</u> . Reports that potentially contain classified or controlled unclassified information (e.g., Unclassified Controlled Nuclear Information or Official Use Only information) must be reviewed and marked in accordance with appropriate directives. If a report includes classified information, it must be contained in a separate classified addendum and an unclassified version of the report must be developed and annotated to indicate the existence, identification, and file location of the classified addendum.	Title 29 C.F.R. Part 1960, Subpart I requires federal agencies to record and report work-related fatalities, injuries, and illnesses of federal employees. It is important to accomplish this function in a manner that is consistent with the private sector and other federal agencies to enable DOE and OSHA analysis and trending of USA-wide data and the development of corrective actions at the DOE level. Requirements that pertain to the dissemination of UCNI are necessary to protect the nature of DOE's classified information	The proper handling of classified or controlled unclassified information applies not only to injury and illness recordkeeping and reporting, but also to other functional reporting areas. "UCNI language" was moved from Chapter II, paragraph 1 to the beginning of the requirements section since it is applicable to all reported information. Requirements section,	Modify

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24 II.1.a.	<p>information (such as UCNI or Official Use Only information.) If classification concerns appear to inhibit completely forthright reporting, the Office of Classification will provide assistance in creating complete yet unclassified reports. If this cannot be accomplished, the reports will be annotated to indicate the existence, identification and file location of any classified addendum.</p> <p><u>Work-Related Fatalities, Injuries, and Illnesses.</u> Heads of Headquarters Elements and Heads of Field Elements will require DOE contractors to report work-related fatalities, injuries, and illnesses occurring among DOE contractor/ subcontractor employees and arising out of work primarily performed at DOE-owned or DOE-leased facilities under their direction.</p> <p>Reports will be submitted to the Chief Health, Safety and</p>	<p>Reports must be submitted as follows.</p> <p>b(1)(a) Work-related fatalities, injuries, and illnesses occurring to Federal employees must be recorded, reported and maintained in accordance with the requirements contained in the current version of Title 29 C.F.R. Part 1960, Subpart I, and the requirements in Attachment 3, paragraphs 1 and 2.</p> <p>-----</p> <p>Att 3 Reporting Occupational Safety and Health Information</p> <p>1. <u>Injury and Illness Recordkeeping and Reporting.</u></p> <p>a. Occupational safety and health reports must be complete and readily available for authorized dissemination outside the cleared community.</p> <p>-----</p> <p>4. <u>REQUIREMENTS.</u></p> <p>Reports must be submitted as follows.</p> <p>b. <u>Reporting Occupational Safety and Health Information</u></p> <p>(1) Injury and Illness Recordkeeping and Reporting</p> <p>(a) Work-related fatalities, injuries, and illnesses occurring to Federal employees must be recorded, reported and maintained in accordance with the requirements contained in the current version of Title 29 C.F.R. Part 1960, Subpart I, and the</p>	<p>and are included in DOE M 470.4-4A. This requirement applies to all reported information.</p> <p>Title 29 C.F.R. Part 1960, Subpart I requires federal agencies to record and report work-related fatalities, injuries, and illnesses of federal employees. It is important to accomplish this function in a manner that is consistent with the private sector and other federal agencies to enable DOE and OSHA analysis and trending of USA-wide data and the development of corrective actions.</p>	<p>paragraph 4b(1)(a) points to Attachment 3, which contains requirements that are common to DOE federal organizations and contractors.</p> <p>*****</p> <p>Clarified language. Added language that identifies Att 3 as containing the relevant requirement to ensure reports are complete and readily available for authorized dissemination outside the cleared community.</p> <p>First sentence is a responsibility. It is unnecessary so it was deleted.</p> <p>Second sentence is redundant to what is in the CRD so it was deleted.</p> <p>Third sentence duplicates oversight requirements included in DOE O 226.1 that must be performed by DOE or contractor operations. This sentence was deleted from the</p>	Modify

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	<p>Security Officer according to procedures provided in paragraphs 3a through 3g of the CRD to this Manual.</p> <p>Periodic, at least twice per year, quality checks will be performed to verify that the information recorded and reported to DOE, through the Computerized Accident/Incident Reporting System, regarding work related injuries and illnesses to DOE contractor employees is thorough, accurate, and consistent with information contained in local records.</p> <p>Heads of Field Elements and the Director for the Office of Management (for Headquarters, including NNSA Headquarters) will record occupational fatalities, injuries, and illnesses occurring among Federal employees arising out of work primarily performed at DOE-owned or DOE-leased facilities.</p> <p>Reports of work-related fatalities, injuries, and illnesses to DOE employees will comply with the recordkeeping and reporting requirements contained in the current version of Title 29, Code of Federal Regulations (CFR), Part 1960, Subpart I, with modifications that follow in paragraphs 1a(1) through 1a(5) and 1c through 1f, below.</p>	<p>requirements in Attachment 3, paragraphs 1 and 2.</p>		<p>Manual.</p> <p>Fourth and fifth sentences were essentially carried forward, except that unnecessary references to applicable follow-on paragraphs were eliminated. Reference is made to requirements in Attachment 3, which pertains to both federal organizations and contractors.</p>	

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
25 II.1.a.(1)	Record all recordable occupational injuries and illnesses experienced by DOE employees on the Log of Work-Related Injuries and Illnesses, OSHA Form No. 300, and complete an annual summary of the information contained on OSHA Form No. 300 using the Summary of Work-Related Injuries and Illnesses, OSHA Form No. 300A (see Appendix B).	<p>4b. <u>Reporting Occupational Safety and Health Information</u></p> <p>(1) Injury and Illness Recordkeeping and Reporting</p> <p>(a) Work-related fatalities, injuries, and illnesses occurring to Federal employees must be recorded, reported and maintained in accordance with the requirements contained in the current version of Title 29 C.F.R. Part 1960, Subpart I, and the requirements in Attachment 3, paragraphs 1 and 2.</p> <p>-----</p> <p>Att 3</p> <p>1. Injury and Illness Recordkeeping and Reporting.</p> <p>b. All recordable, work-related employee fatalities, injuries, and illnesses must be recorded on Occupational Safety and Health Administration (OSHA) Form No. 300, Log of Work-Related Injuries and Illnesses in accordance with 29 C.F.R. § 1904.29. OSHA Form No. 300 must be updated in accordance with 29 C.F.R. § 1904.33.</p> <p>c. An annual summary of the information contained on OSHA Form No. 300 must be compiled, certified, posted and updated using OSHA Form No. 300A, Summary of Work-Related Injuries and Illnesses, in</p>	<p>Title 29 C.F.R. Part 1960, Subpart I requires federal agencies to record and report work-related fatalities, injuries, and illnesses of federal employees. It is important to accomplish this function in a manner that is consistent with the private sector and other federal agencies to enable agency and country-wide analysis and trending and the development of corrective actions.</p> <p>The OSHA Form 300, or an equivalent form allowed by the standard, is used by all private sector employers and all federal agencies to record occupational or work-related injuries and illnesses. An injury or illness is considered work-related if an event or exposure in the work environment caused or contributed to the condition or significantly aggravated a preexisting condition. The OSHA 300 is used to classify work-related injuries and illnesses and to note the extent and severity of each case. When an incident occurs, the OSHA 300 is used to record specific details about what happened and how it happened. OSHA Form 300 is a running log which contains basic information and is used to</p>	<p>Requirements section points to attachment which contains requirements that are common to DOE federal organizations and contractors.</p> <p>.....</p> <p>Separated two requirements (filling in the OSHA 300 and OSHA 300A) and placed them in separate paragraphs – Att 3, paragraphs 1b and 1c.</p> <p>Clarified language.</p> <p>Appendix B information can be found on OSHA’s website and was also moved from the DOE M 231.1-1A manual to the CAIRS Injury and Illness Reporting Guide.</p>	Modify

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27 II.1.a.(3)	Report total employee hours worked on the electronic form DOE F 5484.4, Tabulation of Work-Hours. (See Appendix D for a list of data elements included in the form.) Reports will be submitted in accordance with paragraph 1d below. Access to the DOE F 5484.4 data will be in accordance with paragraph 1f(3) of this chapter.	<p>restricted or transferred (DART) as of the date of the report. Updates to the number of DART or other information previously reported for each case must be submitted quarterly until the case is closed or until the number of DART exceeds 180 days. Quarterly revisions to DART or revisions to other previously-reported information must be submitted for receipt by the 10th of the month following the end of the calendar quarter (i.e., April 10th, July 10th, October 10th, and January 10th).</p> <p>Att 3</p> <p>1. Injury and Illness Recordkeeping and Reporting.</p> <p>e. DOE Form 5484.4, Tabulation of Work Hours, must be used to report total work-hours for all employees. Total work-hours must be submitted electronically on a quarterly basis to CAIRS using CAIRS Direct Data Entry by the 10th of the month following the end of each quarter, i.e., April 10th, July 10th, October 10th, and January 10th. See CAIRS Injury and Illness Reporting Guide at: http://www.hss.doe.gov/csa/analysis/cairs/CAIRS_Reporting_Guide.pdf.</p>	To evaluate an establishment's injury and illness experience over time or to compare an establishment's experience with that of a related industry as a whole, it is necessary to compute an establishment's incidence rate. Because a specific number of workers and a specific period of time are involved, these rates can help an establishment identify problems in the workplace and/or progress an establishment may have made in preventing work-related injuries and illnesses. An incidence rate is the number of recordable injuries and illnesses occurring among a given number of full-time workers (usually 100 fulltime workers)	Appendix D is no longer referenced since it has been deleted from DOE M 231.1-1A and moved to the CAIRS Injury and Illness Reporting Guide. Moved periodicity of reporting into this paragraph and moved accessibility requirements to Att 3, paragraph 2c. Clarified language.	Modify

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28 II.1.a.(4)	Report work-related incidents that involve a fatality or hospitalization of three or more DOE employees, in accordance with the requirements of 29 CFR 1960.70 to the Chief Health, Safety and Security Officer through the designated Federal Employees Occupational Safety and Health Program (FEOSH) Manager.	4b(1) (b) A work-related incident that involves a fatality or hospitalization of three or more Federal employees must be reported to the Chief Health, Safety and Security Officer in accordance with 29 C.F.R. § 1960.70 and 29 C.F.R. § 1904.39. The designated Federal Employees Occupational Safety and Health (FEOSH) Program Manager for each Headquarters Element must report incidents involving their federal employees and Federal employees of DOE Field Elements under their cognizance to the Chief Health, Safety and Security Officer.	over a given period of time (usually one year). OSHA requires each work establishment to enter the average number of employees and the total hours worked by your employees on the OSHA Form 300A. DOE collects total work hours on a quarterly basis in order to affect more timely analysis. Title 29 C.F.R. Part 1960, Subpart I requires federal agencies to record and report work-related fatalities, injuries, and illnesses. Workplace injuries and illnesses that result in the hospitalization of 3 or more workers or that result in a fatality are usually the result of seriously unsafe workplace conditions that require the immediate notification of upper level DOE management and OSHA. Since OSHA regulates the workplace of federal employees, the subsequent DOE notification to OSHA would enable OSHA to conduct an investigation if warranted.	Language clarified.	Modify

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29	II.1.a.(5)	Perform periodic, at least quarterly, quality checks of the information recorded and reported to CAIRS on work related injuries and illnesses to Federal employees to verify that the information is thorough, accurate, and consistent with information contained in local records.	Att 3 1f. Documented quality checks of injury and illness information reported to DOE through CAIRS must be conducted at least quarterly to ensure information is thorough, accurate, and consistent with information contained in local records.	It is important for reporting organizations to ensure that information contained in source documents, such as the OSHA Form 300, OSHA Form 300A and DOE Form 5484.3 meets regulatory requirements and is accurately reflected in information reported into CAIRS.	Language was modified to apply to both federal organizations and contractors.	Modify
30	II.1.a.(6)	Analyze reports of DOE occupational injuries and illnesses to identify trends and preventive measures.	Att 3 1g. Occupational injury and illness information must be analyzed to identify adverse trends and lessons learned and develop corrective actions that prevent recurrence.	It is important for highly reliable DOE organizations to analyze operational information to determine trends. Injury and illness data provides information concerning events that have occurred and should be analyzed to develop corrective actions in order to prevent recurrence. Failure to protect employees from hazards known to the employer would be a violation of the General Duty clause.	It is important for highly reliable organizations to analyze operational information to determine trends. While this was a DOE fed-only requirement, it was modified to also apply to DOE contractors.	Modify/New
31	II.1.b.	<u>Data Collection and Summarization.</u>				
32	II.1.b.(1)	<u>Data Collection.</u> The Chief Health, Safety and Security Officer is responsible for maintaining a centralized operational database of reports submitted in accordance with paragraphs 1c and 1d below. The current system, the Computerized Accident/Incident Reporting System (CAIRS),			The first sentence is an existing HSS responsibility. The second sentence is informational. The reference to Appendix C is unnecessary since it has been moved to the CAIRS Injury and Illness Reporting Guide, and is	Delete

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33	II.1.b.(2)	<p>compiles case information from accident reports submitted by DOE, contractor, and subcontractor employees. The database collects information electronically using either file transfer features in CAIRS Bulk Upload Processing (CBUP) or the direct data entry form features in CAIRS Direct Data Entry (CDDE). A list of data elements to be included in the CAIRS database is provided in Appendix C.</p> <p><u>Periodic Summary of Accident Data.</u> DOE-wide statistical summary information taken from reports submitted in accordance with paragraphs 1c and 1d below will be available through CAIRS quarterly summary reports</p>		<p>already referenced in the revised Order.</p> <p>This is not a requirement, but a responsibility that was included as a responsibility of HS-1.</p>	Delete
34	II.1.c	<p><u>Report Submission—DOE F 5484.3.</u> Effective 180 days following the approval of DOE M 231.1-1A, DOE F 5484.3 will be submitted electronically only, using either CAIRS Bulk Upload Processing or by entering information into the electronic form using CAIRS Direct Data Entry. New reports (DOE F 5484.3) will be submitted at least twice per month for receipt on or before the 15th of the month and the last working day of the month. Initial reports will include the actual work time lost</p>		<p>Requirement still relevant. It was clarified and combined with requirement in Att 3, paragraph 1d.</p>	Merge

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35 II.1.d.	<p>as of the date the report is submitted. Revisions to lost work time will be submitted quarterly until the case is closed. Quarterly revisions for lost work time and any other information that requires revising information initially reported will be submitted for receipt by the 10th of the month following the end of the calendar quarter, i.e., April 10th, July 10th, October 10th, and January 10th. Prior to the transition to required electronic reporting only, legible copies of new and or revised report forms may be mailed. Mailed report forms should be addressed to the CAIRS Data Coordinator, U.S. Department of Energy, HS-30/Bldg. 270 CC, 1000 Independence Ave., S.W., Washington, DC 20585-0270. Additional information about accessing CAIRS and electronic report submission is included in Appendix E of DOE M 231.1-1A and on the Internet at the R&R References and Resources Web page (http://www.hss.energy.gov/csa/csp/cairs/refs.html).</p> <p><u>Submission of Work Hours, DOE F 5484.4</u>. Effective 180 days following the approval of DOE M 231.1-1A, DOE F 5484.4 will be submitted electronically only by entering</p>			Requirement still relevant. Merged into Att 3, 1e.	Merge

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	<p>information into the electronic form using CAIRS Direct Data Entry. Quarterly work-hours will be submitted by the 10th of the month following the end of the quarter (e.g., first quarter CY reports are due April 10). Prior to the transition to electronic reporting only, legible copies of completed report forms (DOE F 5484.4) may be mailed. Mailed report forms should be addressed to the CAIRS Data Coordinator, U.S. Department of Energy, HS-30/Bldg. 270 CC, 1000 Independence Ave., S.W., Washington, DC 20585-0270. Additional information about accessing CAIRS and electronic report submission is included in Appendix E of DOE M 231.1-1A and on the Internet at the R&R References and Resources Web page (http://www.hss.energy.gov/csa/csp/cairs/refs.html).</p>				
36 II.1.e.	<p><u>Posting OSHA Form 300A.</u> OSHA Form No. 300A, will be completed, certified, and posted annually. (See requirements in 29 CFR 1960.66 and 1960.67.)</p>			<p>Requirement still relevant. It was combined with requirement in Att 3, paragraph 1c, which pertains to both federal organizations and contractors.</p>	Merge
37 II.1.f.	<p><u>Supplemental Requirements Regarding Accident/Incident Reports.</u> Heads of Headquarters Elements and Heads of Field</p>			<p>Requirement remains relevant. Included in Att 3, paragraph 1f.</p>	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
38 II.1.f.(1) 1 st sentence	<p>Elements will verify that DOE and DOE contractors are in compliance with the following requirements.</p> <p><u>Retention of Injury/Illness Records and Reports.</u> Heads of Headquarters Elements and Heads of Field Elements will require DOE and DOE contractors to retain personal injury and illness records pursuant to DOE O 200.1, Information Management Program, dated 9-30-96.</p>	<p>Att 3</p> <p>2. Injury and Illness Records retention and accessibility.</p> <p>a. Injury and illness records must be retained pursuant to DOE O 243.1, <i>Records Management Program</i>, dated 2-3-06 and DOE Administrative Records Schedule 1: Personnel Records, September 2010, Occupational Injury and Illness Files, N1-434-98-4, item 34.</p>	<p>While Public Law 91-596 and 29 CFR 1904 requires that, OSHA's Form 301, or DOE's equivalent, DOE Form 5484.3 must be kept on file for 5 years following the year to which it pertains, DOE records need to be retained in accordance with DOE O 234.1 and other relevant DOE requirements.</p>	<p>Modified language reflects references that pertain to records retention.</p>	Modify
39 II.1.f.(1) 2 nd and 3 rd sentences	<p>DOE elements will require DOE site/facility management contractors, upon termination of contracts for work being performed for DOE, to submit injury and illness records to the site/facility management contractor organization that will assume OSH responsibilities for the facility.</p> <p>Additionally, Heads of Headquarters Elements and Heads of Field Elements will require DOE site/facility management contractors assuming OSH responsibilities for work being performed for DOE to retain previous operating contractors' accident records.</p>	<p>Att 1 CRD</p> <p>2. <u>Reporting Occupational Safety and Health Information.</u></p> <p>a. Injury and Illness Recordkeeping and Reporting.</p> <p>(2) A contractor with an expiring or terminated contract must transfer all occupational safety and health records involving work performed for DOE to the assuming contractor or DOE facilities management. The assuming contractor must accept and maintain these records as part of performing occupational safety and health responsibilities and in accordance with Attachment 3,</p>	<p>29 C.F.R. § 1904.33 requires the retention of the OSHA Forms 300, 300A and 301 (or the DOE equivalent). The transfer of records between owners if there is a change in business ownership is equivalent to what is contained in 29 CFR § 1904.34. This ensures that subsequent business owners can learn from the injuries and illnesses that occurred during previous operations and continue implementing appropriate corrective actions or develop new corrective actions in response to continuing health and safety issues.</p>	<p>Language was clarified and updated. Removed responsibility language.</p>	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
		paragraph 2. (See record retention requirements in 29 C.F.R. § 1904.33 and DOE Administrative Records Schedule 1: Personnel Records, September 2010, Occupational Injury and Illness Files, N1-434-98-4, item 34)				
40	II.1.f.(2) 1 st sentence	<u>Maintenance of Injury and Illness Reports.</u> Heads of Headquarters Elements and Heads of Field Elements will maintain injury and illness records pursuant to 29 CFR 1960.66 and 1960.69.		Requirement still relevant. Included in paragraph 4b(1)	Merge	
41	II.1.f.(2) 2 nd sentence	Heads of Headquarters Elements and Heads of Field Elements will ensure that DOE site/facility management contractors assuming OSH responsibilities for work being performed for DOE will maintain previous operating contractors' accident records		First part of sentence is a responsibility. Second half of sentence is redundant with what is already in CRD, Att1, Paragraph 2a(2)	Delete	
42	II.1.f.(3)	<u>Access to Accident Records and Reports</u>				
43	II.1.f.(3)(a))	An employee, former employee, and/or his/her representatives have the right to limited access of the OSHA Form No. 300 that contains the employee's name.	Att 3 2. Injury and Illness Records retention and accessibility. c. Employees, former employees, and/or their representatives must be provided limited access to the OSHA Form No. 300 or a copy of the Individual Accident Incident	This requirement is equivalent to what is contained in 29 CFR 1904.35, which provides for employee involvement. It is important for an employee to understand what personal injury or illness information is known about them in order for them to assess whether interim protective measures and	Language was clarified and moved to Attachment 3, paragraph 2c since it applies to both federal organizations and contractors, and includes access to DOEF 5484.3, since it is the supplemental form to the OSHA 300.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
		Report that contains the employee's name.	corrective actions are adequate to prevent recurrence to themselves and others in the workplace.		
44 II.1.f.(3)(b)	Access is limited according to the requirements of the Privacy Act, Section 5 U.S.C § 552a and the Freedom of Information Act (FOIA). In accordance with requirements contained in Section 5 U.S.C.§ 552(b)(6) of the FOIA, access to information on any log maintained for DOE or by DOE or DOE contractors, will be restricted to information that does not constitute an unwarranted invasion of personal privacy. An employee whose name does not appear on a log will be limited to information that does not identify any injured or ill employees, and will not be provided access to the names of the injured or ill employees. An employee, former employee, and/or authorized representatives will have access to DOE F 5484.3 data that contains the employee's name as the injured or ill worker. Additional information on employee rights of access to these forms is provided in 29 CFR subparts 1960.66 and 1960.69.	Att 3 2. Injury and Illness Records retention and accessibility. b. Access to personal injury/illness records is subject to the Privacy Act, Title 5 U.S.C. Section 552a and the Freedom of Information Act (FOIA) requirements and restrictions. [See Title 5 U.S.C. Section 552(b)(6).] Access to information on any OSHA Form No. 300 must be restricted to information that does not constitute an unwarranted invasion of personal privacy. An employee whose name does not appear on a OSHA Form No. 300 must be limited to accessing information that does not identify any injured or ill employees, and must not be provided access to the names of the injured or ill employees.	This requirement is equivalent to what is contained in 29 CFR 1904.35, which provides for employee involvement. It is important for an employee to have limited access to the OSHA 300 that contains their name in order for them to assess whether interim protective measures and corrective actions are adequate to protect them and prevent recurrence.	Language was clarified and moved to Attachment 3, paragraph 2c since it applies to both federal organizations and contractors.	Modify
45 II.1.f.(3)(c)	Records listed in 29 CFR 1904.4 and 1904.5 (or the DOE	Att 3 2. Injury and Illness	This requirement is equivalent to what is contained in 29 CFR	Requirement remains relevant.	Retain

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
46 II.1.f.(3)(d)	<p>equivalent of these records) will be made available for inspection and copying by any Department of Energy representative for the purpose of conducting oversight assessments or for statistical compilation.</p> <p>Records required to be maintained under the provisions of 29 CFR subparts 1960.66 will be made available upon request to the Secretary of Labor and the Secretary of Health and Human Services or their authorized representatives.</p>	<p>Records retention and accessibility.</p> <p>d. Records listed in 29 C.F.R. §§ 1904.4 and 1904.5 (or the DOE equivalent of these records) must be made available for inspection and copying by any DOE representative for the purpose of conducting oversight assessments or for statistical compilation.</p>	<p>1904.40. It is important to accurately and consistently record federal and contractor injuries and illnesses. Consistent recording of data enables statistical compilation and comparison to determine the need for emphasis or special focus. These records must be made available to authorized DOE representatives.</p>	<p>Repeating OSHA regulation is unnecessary and pertains to interactions between DOE and another agency and is primarily a responsibility.</p>	Delete
47 II.1.f.(4)	<p><u>Updating Accident Records and Reports.</u> Heads of Headquarters Elements and Heads of Field Elements will require DOE and DOE site/facility management contractors to update OSHA Form No. 300 pursuant to 29 CFR 1960.66 and 1960.69 and 29 CFR 1904.33. Each quarter, for at least one year from the date of the injury/illness, DOE elements must update each DOE F 5484.3 that includes lost work time (either days away from work or days restricted/transferred) for a DOE employee and verify that contractors update this</p>			<p>The requirement was streamlined and merged with Att 3. 1d.</p>	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
48	II.1.f.(5)	<p>information for contractor employees. DOE F 5484.3 should be updated to indicate changes in lost work time or changes in the description or outcome of the case.</p> <p><u>Interpretation of Reporting Requirements.</u> For additional information or interpretation of occupational injury and illness reporting requirements contained in this Manual, contact the Office of Corporate Safety Analysis.</p>	<p>Att 3</p> <p>1. Injury and Illness Recordkeeping and Reporting.</p> <p>j. Clarifications of DOE occupational injury and illness recordkeeping and reporting requirements must be issued only by the Office of Environmental Protection, Sustainability Support and Corporate Safety Analysis.</p>	<p>This requirement is equivalent to 29 CFR 1904.38. It is important that only one DOE source (HSS) issue clarifications if DOE-specific questions about recordkeeping and reporting are not covered by related FAQs on OSHA's website. This ensures the consistency of recording and reporting of injuries and illnesses and the integrity of subsequent analysis.</p>	<p>Requirement remains relevant but language was clarified.</p>	Modify
49		<p>Att 3</p> <p>1. Injury and Illness Recordkeeping and Reporting.</p> <p>h. Discrepancies identified by DOE during periodic assessments or by other reviews of work-related injury and illness records must be corrected as directed by the DOE reviewing organization.</p>	<p>In order to ensure accuracy and consistency in analysis of DOE injury and illness information, discrepancies identified by DOE must be corrected to ensure compliance with 29 CFR 1904 recordkeeping and reporting requirements and to ensure consistency of reported information.</p>	<p>Discrepancies identified by DOE must be corrected to ensure accuracy and consistency in analysis of DOE injury and illness information.</p>	New	
50		<p>Att 3</p> <p>i. Individuals assigned occupational injury and illness recording and reporting responsibilities must be trained to accomplish assigned recording and reporting responsibilities.</p>	<p>This requirement already exists for contractors, but is new for federal employees with recording and reporting duties. Training must enable employees (with recording keeping and reporting</p>	<p>This requirement already exists for contractors, but is new for federal employees with recording and reporting duties.</p>	New	

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
51 II.1.f.(6)	<p><u>Reporting Injury and Illness Cases to Subcontract Employees.</u> Attachment 1, paragraphs 3c, 3d, and 3e provide requirements for DOE contractors relating to reporting occupational injury and illness cases that occurred to subcontractor employees. Heads of Headquarters Elements or their designated DOE field organization contacts can approve exemptions to DOE contractors from the requirements in Attachment 1, paragraph 3d. They can also approve an alternative method to the method required in Attachment 1, paragraph 3e for reporting injuries and illness to select subcontractors who meet either of the conditions in</p>		<p>responsibilities) to determine: when an injury or illness considered work-related; which work-related injuries and illnesses should be recorded; what special conditions are considered work-related; what is medical treatment; what actions need to be taken; how to work with the Log; what is first aid; how to decide if the case involved restricted work; how the number of days of restricted work activity or the number of days away from work are counted; and how to classify injuries.</p>	<p>Since this language duplicates what is contained in the CRD and paraphrases CRD requirements in terms of responsibilities, it was deleted.</p>	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
52 II.2, 1 st sentence	<p>paragraph 3d.</p> <p><u>ANNUAL FIRE PROTECTION SUMMARY</u>. Organizations responsible for maintaining property under stewardship of DOE and the Administrator, NNSA, will seek concurrence with their appropriate Head of Field Element and submit specifically formatted fire protection program CY summary reports to the Chief Health, Safety and Security Officer by April 30 of the following year.</p>	<p>4. <u>REQUIREMENTS</u>. Reports must be submitted as follows.</p> <p>b. <u>Reporting Occupational Safety and Health Information</u></p> <p>(2) Annual Submission of Fire Protection Information. Fire protection information must be reported in accordance with Attachment 3, paragraph 3.</p> <p>-----</p> <p>Att 3</p> <p>3. <u>Annual Fire Protection Summary Information</u>. A summary of fire protection information for the preceding year must be submitted to the fire protection database by April 30 in accordance with the Annual Fire Protection Summary Information Reporting Guide located at: http://www.hss.doe.gov/CSA/CSA/P/qaps/Annual_Fire_Protection_Summary_Information_Reporting_Guide.pdf</p>	<p>Entering the data into the database is a requirement. It is important to consistently report and collect data and conduct analysis in order to compare the performance of DOE with other federal agencies and private sector employers in order to identify adverse trends, positive trends, develop corrective actions and develop lessons learned.</p>	<p>Requirements section points to Attachment 3 which contains requirements that are common to DOE federal organizations and contractors.</p> <p>*****</p> <p>Language is modified to delete responsibilities and add specific web location for user's guide.</p>	Modify
53 II.2, 2 nd sentence	<p>The Chief Health, Safety and Security Officer will provide reporting organizations and DOE Field Elements with a computer-based application for submitting formatted summaries and will maintain a database reporting system that compiles reports submitted in accordance with the reporting elements described in</p>			<p>This is a responsibility, not a requirement. It was moved to the responsibility section. Appendix F was moved to a web-based reporting guide since Appendix F describes the database and contains data field definitions.</p>	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
		Appendix F.				
54	II.2, 3rd sentence	The Chief Health, Safety and Security Officer will produce a CY summary of Fire Protection Programs for the Department and will make available a database summary of all reporting elements of DOE contractors and DOE Field Elements for trending data supplemental to the Environment, Safety and Health annual summary report.			This is a responsibility, not a requirement. This was moved to the responsibility section.	Delete
55	II.3.	<u>REPORTING INFORMATION FOR EPIDEMIOLOGIC ANALYSES – EXCESS INJURIES AND ILLNESSES</u>				
56	II.3.a.	Heads of Headquarters Elements and Heads of Field Elements will notify the Chief Health, Safety and Security Officer of suspected illness or injury excesses that require epidemiologic investigation. In this context, suspected excess means the perception that an unusually high number of cases may be occurring among a group of workers. Epidemiologic analyses can help determine whether suspected illness or injury excesses are greater than expected and are associated with working conditions. Any worker, individual, or group (for example, safety and health staff, supervisors, or employee			First sentence is a responsibility, not a requirement. Responsibility to report excess injuries and illnesses was moved to the responsibility section. Remainder of paragraph is explanatory material, not a requirement.	Delete.

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
57	II.3.b.	representatives) can identify suspected illness or injury excesses. The Chief Health, Safety and Security Officer, who is responsible for all Departmental health studies of human populations, directs the investigations of suspected excesses through staff of the Office of Injury and Illness Prevention Programs.			This paragraph is a responsibility, contains explanatory material, and is not a requirement.	Delete
58	II.3.c.	Reporting organizations participate in epidemiologic investigation(s), which will determine the number of affected individuals, their medical diagnoses, and their hazard exposures. The investigation may involve medical tests, work place surveys, and reviews of personnel, medical, and exposure records.			This paragraph is explanatory material, not a requirement.	Delete
59	II.4.	<u>REPORTING INFORMATION FOR EPIDEMIOLOGIC ANALYSES – OSH STUDIES</u>				
60	II.4.a.	The September 2000 memorandum of understanding between DOE and the Department of Health and Human Services (DHHS), which supersedes the December 1990 memorandum, reassigned management responsibility for a range of epidemiologic research projects and related activities			This paragraph is explanatory material, not a requirement.	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
61 II.4.b.	<p>addressing worker and community health to the DHHS Centers for Disease Control and Prevention (CDC) constituent agencies, including the National Institute for Occupational Safety and Health, the Agency for Toxic Substances and Disease Registry, and the National Center for Environmental Health. Much of the research focuses on illness, injury, and death to determine whether exposure to ionizing radiation and chemicals has had impact on worker health. These agencies have become users of data collected originally to fulfill OSHA requirements and collectors of additional research data.</p> <p>Heads of Field Elements will provide CDC officials, their contractors, and grantees access to the DOE facilities, workers, information, and data needed to conduct these studies. The investigators will comply with Privacy Act and security requirements.</p>			This paragraph is explanatory material, not a requirement.	Delete
62 II.5.	<p><u>ANNUAL REPORT TO THE SECRETARY OF ENERGY.</u> The Chief Health, Safety and Security Officer shall submit an annual report to the Secretary describing the status and adequacy of DOE, including</p>			Requirement no longer valid. The Chief Health, Safety and Security Officer provides occupational safety and health performance information in various	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
	NNSA, and contractor performance of their occupational safety and health responsibilities. The annual report for the calendar year will be submitted to the Secretary by May of the following year.			forms to the Secretary throughout the year. As a result, specifying an annual report is no longer necessary.	
63 II.6.	<u>ANNUAL FEDERAL EMPLOYEE OCCUPATIONAL SAFETY AND HEALTH REPORT.</u> The Director for the Office of Corporate Safety Analysis is designated by the Chief Health, Safety and Security Officer to prepare and submit an annual fiscal year report to the Department of Labor on the DOE occupational safety and health program. The report will contain such information as the Secretary of Labor prescribes. [See 29 CFR 1960.71]			This report is required by regulation and is sent to another federal agency. This type of reporting is not consistent with the types of reporting required by this directive, that are internal in nature, which enable the Department to ensure compliance with regulatory requirements and assess internal performance.	Delete
64 Chapter III	<u>REPORTING IONIZING RADIATION EXPOSURE INFORMATION</u>				
65 III.1.	<u>EXPOSURE REPORTS TO THE RADIATION EXPOSURE MONITORING SYSTEM (REMS) REPOSITORY.</u>				
66 III.1.a.	<u>Annual Individual Radiation Exposure Records.</u>				
67 III.1.a.(1)	Heads of Headquarters Elements and Heads of Field Elements will report annual radiation exposure records required by 10	4. <u>REQUIREMENTS.</u> Reports must be submitted as follows. c. <u>Reporting Ionizing</u>	10 C.F.R. Part 825.702(a) requires the maintenance of records to document doses received by individuals under	Requirements section points to Attachment 4 which contains	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
	CFR 835.702(a) and (b) to the REMS repository by March 31 for the preceding monitoring year. The records should include exposure records for special individuals as described in paragraph 1b(1) of this chapter.	<p><u>Radiation Exposure Information</u> Ionizing radiation exposure information must be reported in accordance with Attachment 4.</p> <p>----- Att 4</p> <p>1. <u>Annual Individual Radiation Exposure Records.</u> a. Annual radiation exposure records for the preceding monitoring year, required to be collected by 10 C.F.R. § 835.702, must be reported to the REMS repository by March 31. The records must include exposure records for special individuals as defined in Attachment 4, paragraph 2a.</p>	different circumstances and that the records be sufficient to provide dose information necessary to evaluate exposures, evaluate compliance, and provide reports to individuals. The REMS repository provides a central database for these records and ensures data consistency. Annual reports must be submitted by March 31 st each year to ensure that all data is received by a specific time and that analysis can be performed on a consistent set of data. The data is used by researchers, epidemiologists and other federal agencies. Example - NIOSH uses the data to reconstruct historical doses for compensation purposes.	requirements that are common to DOE federal organizations and contractors. Requirement remains essentially the same. Removed reference to who is responsible for submitting reports and clarified language.	
68 III.1.a.(2)	Revisions to radiation exposure records for monitoring periods beginning on or after January 1, 1989, will be reported to the REMS repository. Revised records for prior monitoring years will be submitted annually by March 31. However, if the revised dose record results in a dose exceeding regulatory dose limits defined in 10 CFR 835.202, revised records will be submitted within 30 days of the date that the dose record is revised. Revised records should be submitted to the REMS	<p>Att 4</p> <p>1. <u>Annual Individual Radiation Exposure Records.</u> b. Revisions to radiation exposure records for monitoring periods beginning on or after January 1, 1989, must be reported to the REMS repository. Revised records for prior monitoring years must be submitted annually by March 31. However, if the revised dose record results in a dose exceeding regulatory dose limits defined in 10 C.F.R. § 835.202,</p>	10 C.F.R. Part 825.702(a) requires the maintenance of records to document doses received by individuals under different circumstances and that the records be sufficient to provide dose information necessary to evaluate exposures, evaluate compliance, complete reports to individuals. The REMS repository provides a central database for these records and ensures data consistency. Data is required to maintain individual’s career doses. It is	Clarified language.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
	repository in a separate file, but in the same format as annual records. The transmittal documentation should note that the enclosed records are revised.	revised records must be submitted within 30 days of the revision to the dose record. Revised records must be submitted to the REMS repository in a separate file in the same format as annual records. The transmittal documentation must identify the enclosed records as revised records.	also important to report changes made to reports filed in previous years and to report more quickly exposures that exceed regulatory dose limits.			
69	III.1.b.	<u>Radiation Exposure Records for Special Individuals.</u>				
70	III.b.(1)	A special individual is a person employed by DOE Headquarters, a contractor supporting DOE Headquarters or Field Office activities, a Defense Nuclear Facilities Safety Board employee or contractor, or an International Atomic Energy Agency inspector who visits a DOE or DOE contractor site or facility to conduct Department-related business. Radiation exposure data pertaining to special individuals will be reported to the REMS repository within 30 days after the determination of the dosimetry.	Att 4 2. <u>Radiation Exposure Records for Special Individuals.</u> a. Radiation exposure data pertaining to special individuals, which includes individuals employed by DOE Headquarters, a contractor supporting DOE Headquarters or Field Office activities, a Defense Nuclear Facilities Safety Board employee or contractor, or an International Atomic Energy Agency inspector who visits a DOE or DOE contractor site or facility to conduct Department-related business, must be reported to the REMS repository simultaneous with dispatch of reports to individuals, within 30 days after the assessment of the radiation exposure.	10 CFR 835 requires the collection of exposure data for special individuals. While federal employees and contractor employees who work at a given site are regularly monitored, individuals who visit or work at the site on an irregular basis may not automatically be covered by monitoring requirements. The addition of this requirement ensures that all potentially exposed individuals are covered. It is also important to report such exposure data on a timely basis to REMS.	Clarified language.	Modify
71	III.1.b.(2)	Each DOE or DOE contractor employee or a special individual	Att 4 2. <u>Radiation Exposure</u>	10 CFR 835 requires the collection of exposure data for	Clarified language.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
	who visits, in an official capacity, a radiological site outside of the DOE shall arrange to have all pertinent occupational radiological exposure data to his or her employer within 30 days after determination of the dosimetry.	<u>Records for Special Individuals.</u> b. Each employee or special individual who is acting in an official capacity at a non-DOE facility and is monitored for occupational radiation exposure must provide the monitoring results to their employer within 30 days of receipt. Employers must instruct individuals of this responsibility prior to directing individuals to conduct such activities at a non-DOE facility.	special individuals. Att 4, paragraph 2a covers the collection of exposure data for special individuals at a DOE site or facility, but does not cover potential exposure at a radiological site outside DOE. Collection of data in these additional circumstances ensures that all potential exposures are captured for compilation, analysis and reporting.		
72	III.1.b.(3) Heads of Headquarters Elements, Heads of Field Elements, and contractors shall verify that such procedures exist and are effective in support of paragraph 1b(2) above.	Att 4 2. <u>Radiation Exposure Records for Special Individuals.</u> c. Procedures to effectively support the collection of dosimetry records in support of this requirement must be verified on a regular basis.	10 CFR 835 requires the collection of exposure data for special individuals. It is important to develop procedures to collect data for special individuals who are potentially exposed at a radiological site outside DOE and may not be covered by local site procedures.	Clarified language.	Modify
73	III.1.c. <u>Report Format.</u> All radiation exposure reports of records collected during and after CY 2005 and sent to the REMS repository as noted in paragraphs 1a and 1b must be submitted in electronic format and prepared in accordance with Appendix G of this Manual.	Att 4 3. <u>Report Format.</u> All occupational radiation exposure reports of records collected and sent to the REMS repository as noted in Attachment 4, paragraphs 1 and 2 must be prepared in accordance with the REMS Reporting Guide located at http://www.hss.doe.gov/csa/analysis/rem/REMS_Reporting_Guide.pdf and submitted in	Format described in the on-line User's Guide is required to upload the data to REMS database. Submission of data in a common format ensures that data can be reported consistently and analyzed efficiently.	Clarified language. Since Appendix G was placed in an on-line reporting guide on the REMS web site, reference is made to the web link.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
74	III.1.d.	<u>Exposure Reports to Individuals.</u> Reports to individuals must be prepared in accordance with 10 CFR 835.801.	<p>electronic format in accordance with the current HSS policy for submitting personally identifiable information (PII) to the REMS repository as posted on the REMS web page at http://www.hss.doe.gov/csa/analysis/remis/PII_reporting_requirements_F-5-13-09_FNL.pdf.</p> <p>Att 4</p> <p>4. <u>Exposure Reports to Individuals.</u> Reports to individuals must be prepared in accordance with 10 C.F.R. § 835.801.</p>	10 C.F.R. 835.801 requires reporting exposure information to individuals. Is necessary to inform individuals of their dosimetry results so they can make informed decisions about their activities that may involve potential radiological exposure and to protect them from over exposure.	Requirement remains valid.	Retain
75		<p>4. <u>REQUIREMENTS.</u> Reports must be submitted as follows.</p> <p>d. <u>Reporting Safety Basis Information</u></p> <p>The status of the safety basis of hazard category 1, 2 and 3 nuclear facilities must be maintained up-to-date in the Safety Basis Information System (SBIS) at: http://www.hss.doe.gov/nuclearsafety/ns/sbis/</p>	10 CFR 830.202 (a) Safety Basis, requires a contractor responsible for a hazard category 1, 2, or 3 DOE nuclear facility to establish and maintain the safety basis for the facility. It is necessary to maintain the status of the safety basis for those facilities. A safety basis for a DOE nuclear facility is documented in the documented safety analysis and the hazard controls for the nuclear facility. As changes are made or potential inadequacies of the safety analysis are discovered, contractors must perform USQ determinations.	It is necessary to maintain an accurate listing of DOE hazard category 1, 2 and 3 nuclear facilities and the measures in place to ensure their safety.	New	

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
76 Attachment 1	CONTRACTOR REQUIRMENTS DOCUMENT DOE M 231.1-1A, ENVIRONMENT, SAFETY, AND HEALTH REPORTING		The results of the USQ determinations and any associated safety evaluations are part of the safety basis for the facility. A change to any part of any facility’s safety basis must be entered into the SBIS by DOE to maintain an accurate status of the safety basis. Central reporting of the status of safety basis enables DOE corporate reporting.		
77 Attachment 1	Regardless of the performer of the work, contractors with the CRD incorporated into their contracts are responsible for compliance with the requirements of the CRD. Affected contractors also are responsible for flowing down the requirements of the CRD to subcontracts at any tier to the extent necessary to ensure the contractor’s compliance with the requirements. In doing so, the contractor must not unnecessarily or imprudently flow down requirements to subcontracts. That is the contractor must both ensure that it and its subcontractors comply	CRD Att 1 1 st paragraph Regardless of the performer of the work, the contractor is responsible for complying with the requirements of this CRD. The contractor is responsible for flowing down the requirements of this CRD to subcontractors at any tier to the extent necessary to ensure the contractor’s compliance with the requirements. 2 nd paragraph In addition to the requirements included in this CRD, contractors are responsible for complying with Attachments 2, 3, 4, and 5	The location of specific requirements must be identified to the contractor. It must be clearly stated that these requirements must be flowed down to sub-tiered contractors. ***** The text referencing compliance with the attachments is found at the beginning of each attachment subsequent to Attachment 1. The text indicates that contractors must comply with the requirements in the attachments as well as the CRD. *****	Language was streamlined and clarified. Since requirements that are common to both federal organizations and contractors were merged so that the requirements are stated one time, compliance with Attachments containing those requirements was added (2, 3, 4 and 5). Since some of the original language explains how to implement the requirements, the language was deleted.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
78 Attach 1 1. All but last sentence and parenthetical phrase	with the requirements of this CRD and only incur costs that would be incurred by a prudent person in the conduct of competitive business. The contractor must develop site-wide and facility-wide procedures, protocols, or other methods to meet the reporting requirements in this CRD as indicated below. <u>ENVIRONMENTAL PROTECTION PROGRAM REPORTING.</u> Ensure that environmental, safety, and health reports are complete and readily available for authorized dissemination outside the cleared community. Ensure that when accidents or incidents occur in Unclassified Controlled Nuclear Information (UCNI) sensitive facilities and/or involve classified operations, the local classification officer is consulted to ensure that such reports do not inadvertently disclose classified or unclassified controlled information (such as UCNI or Official Use Only information.) If classification concerns appear to inhibit completely forthright reporting, the Office of Classification will provide assistance in creating complete yet unclassified reports. If this	to DOE O 231.1B referenced in and made a part of this CRD as set forth below. CRD Attachment 1 3 rd paragraph Reports that potentially contain classified or controlled unclassified information (e.g., Unclassified Controlled Nuclear Information or Official Use Only information) must be reviewed and marked in accordance with appropriate Directives. If a report includes classified information, it must be contained in a separate classified addendum and an unclassified version of the report must be developed and annotated to indicate the existence, identification, and file location of the classified addendum.	Requirements that pertain to the dissemination of UCNI are necessary to protect the nature of DOE's classified information and are included in DOE M 470.4-4A. This requirement applies to all reported information.	The proper handling of classified or controlled unclassified information applies not only to injury and illness recordkeeping and reporting, but also to other functional reporting areas. "UCNI language" was moved from paragraph 1, which pertains to environmental protection program reporting to the beginning of the requirements section since it is applicable to all reported information.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
79	cannot be accomplished, the reports must be annotated to indicate the existence, identification and file location of any classified addendum.				
80	Attach 1 1. Last sentence and parenthetical phrase	Ensure the information described below is reported annually, considering annual guidance provided by the Chief Health, Safety and Security Officer on the Web-based Pollution Prevention Tracking and Reporting System (PPTRS), unless otherwise indicated. (These reporting requirements relate to activities carried out or conducted under the contractor's ISMS and the CRD to DOE O 450.1, <i>Environmental Protection Program</i> .)		Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
81	Attach 1 1.a.	Information on site progress in implementing Environmental Management Systems (EMSs) shall be reported to the Cognizant Secretarial Officer and the Chief Health, Safety and Security Officer, as appropriate.		Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
82	Attach 1 1.b.	Information on site progress in reducing or eliminating the generation of waste, the release of pollutants to the environment, and the use of Class I ozone-depleting substances (ODS).			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
83	Attach 1 1.c.	Information on site procurement of recycled-content materials and environmentally preferable products and services.			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete
84	Attach 1 1.d.	Information on pollution prevention award nominations from sites, and nominations selected as “best in class” by Heads of Headquarters Elements and Heads of Field Elements. ¹ The Chief Health, Safety and Security Officer will submit the selected “best in class” pollution prevention awards to the White House “Closing the Circle”			Deleted environmental protection, energy and environmental sustainability program reporting requirements which overlap what is generally covered by DOE O 436.1, <i>Departmental Sustainability</i> , issued on 5-2-11.	Delete

¹Whenever “Heads of Headquarters Elements” is used in this CRD, it includes Secretarial Officers, Administrator for NNSA, Administrators for the Power Administrations, and Heads of Staff Offices. Likewise, whenever Heads of Field Elements is used in this CRD, it includes Operations Offices, Field Offices, Site Offices, Service Centers, Project Offices, and Area Offices.

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
85	award competition.	CRD Att 1 1. <u>Reporting Annual Site Environmental Information.</u> Contractors must comply with the requirements in Attachment 2 that pertain to reporting annual site environmental information.	This is not a specific requirement – it is a pointer to a requirement that also applies to federal organizations, which is contained in Attachment 2.	Environmental reporting responsibilities common to DOE federal organizations and contractors are contained in Att 2. This requirement identifies to contractors that Annual Site Environmental Reporting requirements are in Att 2.	New
86	Attach 1 2.	<u>ANNUAL SITE ENVIRONMENTAL REPORT.</u> Provide all necessary assistance, including partial or full preparation of the Annual Site Environmental Report (ASER), to the Head of the Field Element, as directed and appropriate, in meeting the annual site environmental reporting requirement to DOE headquarters each October 1 st .		Merged with Att 2, second introductory paragraph.	Merge
87	Attach 1 2.a.	Ensure that information needed to prepare an integrated Annual Site Environmental Report for each calendar year is provided to the Head of the Field Element. This information will include summary environmental data in order to:		Merged with Att 2, second introductory paragraph.	Merge

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
88	Attach 1 2.a.(1)	Characterize site environmental management performance. Include data on effluent releases, environmental monitoring, and estimated radiological doses to the public from releases of radioactive material at DOE sites.			Merged with Att 2, paragraph 1.	Merge
89	Attach 1 2.a.(2)	Summarize environmental occurrences and responses reported during the calendar year (CY).			Merged with Att 2, paragraph 2.	Merge
90	Attach 1 2.a.(3)	Confirm compliance with environmental standards and requirements.			Merged with Att 2, paragraph 3.	Merge
91	Attach 1 2.a.(4)	Highlight significant programs and efforts. Include environmental performance indicators and/or performance measures programs. The breadth and detail of this reporting should reflect the size and extent of programs at a particular site.			Merged with Att 2, paragraph 4.	Merge
92	Attach 1 2.a.	The Annual Site Environmental Report for the calendar year will be completed and made available to the public by October 1 of the following year, and an informational copy will be submitted to the Chief Health, Safety and Security Officer at that time.			Merged with Att 2, second introductory paragraph.	Merge

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
93	Attach 1 2.b.	Ensure adherence to the reporting schedule and guidance provided by the Office of Corporate Safety Analysis regarding reporting information for the Annual Site Environmental Reports.			Merged with Att 2, second introductory paragraph.	Merge
94	Attach 1 3.	<u>INJURY AND ILLNESS RECORDKEEPING AND REPORTING.</u> Ensure that environmental, safety, and health reports are complete and readily available for authorized dissemination outside the cleared community. Ensure that when accidents or incidents occur in Unclassified Controlled Nuclear Information (UCNI) sensitive facilities and/or involve classified operations, the local classification officer is consulted to ensure that such reports do not inadvertently disclose classified or unclassified controlled information (such as UCNI or Official Use Only information.) If classification concerns appear to inhibit completely forthright reporting, the Office of Classification will provide assistance in creating complete yet unclassified reports. If this cannot be accomplished, the reports must be annotated to indicate the existence, identification, and file location of any classified addendum.			First sentence was merged with Att 3 paragraph 1a. UCNI requirements were merged with Attachment 1, third introductory paragraph.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
95 Attach 1 3.a.	At a facility or site where DOE is exercising its authority to regulate worker safety and health (rather than have the Occupational Safety and Health Administration directly regulate the facility or site) the contractor is responsible for keeping records for work-related fatalities, injuries, and illnesses. Unless otherwise directed in this CRD, the contractor must ensure that records are kept as directed in Title 29 Code of Federal Regulations (CFR) 1904.4 through 1904.11, 1904.29 through 1904.32, 1904.44, and 1904.46.	Att 1 2. <u>Reporting Occupational Safety and Health Information.</u> a. Injury and Illness Recordkeeping and Reporting. (1) Contractors must ensure that work-related fatalities, injuries, and illnesses that occur to their employees and subcontractor employees are recorded and reported accurately and in accordance with 29 C.F.R. §§ 1904.4 through 1904.11, 1904.29 through 1904.32 and 1904.46 and Attachment 3, paragraph 1. This requirement excludes transient and small employer subcontractors. A transient subcontractor does not maintain an onsite office, does not receive direction/oversight from DOE or a DOE contractor, and their work is limited to transient activities, e.g., copy machine repair, express mail delivery, bottle water delivery, vending machine repair service. A small employer subcontractor employs less than 10 employees at a DOE site either directly or through sub-tiered contracts.	DOE has exercised its statutory authority to regulate the safety and health of its contractors. DOE requires its contractors to comply with the safety and health recording and recordkeeping requirements in specific sections of 29 CFR 1904. It is essential that injuries and illnesses to employees be consistently recorded so that data can be trended and corrective actions implemented to prevent potential injuries and illnesses.	Clarified language. Added requirement to comply with Attachment 3 paragraph 1, where requirements common to both federal organizations and contractors are listed.	Modify
96 Attach 1 3.b.	Ensure that the following recording and reporting requirements are followed.				
97 Attach 1 3.b.(1)	Record all recordable work-related contractor employee			Merged with Att 3, paragraphs 1b and 1c.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
98 Attach 1 3.b.(2)	<p data-bbox="302 228 688 656">fatalities, injuries, and illnesses on Occupational Safety and Health Administration (OSHA) Form No. 300, Log of Work-Related Injuries and Illnesses, and complete an annual summary of the information contained on OSHA Form No. 300 using OSHA Form No. 300A, Summary of Work-Related Injuries and Illnesses [See Appendix B to DOE M 231.1-1A].</p> <p data-bbox="302 678 688 1377">Record and report all recordable work-related contractor employee fatalities, injuries and illnesses on the form DOE F 5484.3, Individual Accident/Incident Report, in lieu of the OSHA Form No. 301, Injury and Illness Incident Report. Reports must be submitted to the Computerized Accident/Incident Reporting System (CAIRS). Either method identified in paragraph 3f below satisfies this requirement. (See Appendix C for a list of data elements included in the form.) Access requirements for DOE F 5484.3 data are described in paragraph 3i below. Submission and posting of reports are described in 3f and 3h below.</p>			Merged with Att 3, paragraph 1d.	Merge
99 Attach 1 3.b.(3)	Report employees' total hours worked on DOE F 5484.4, Tabulation of Work-Hours.			Merged with Att 3, paragraph 1e.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
100	Attach 1 3.b.(4)	Access requirements for DOE F 5484.3 data are described in paragraph 3i below. Submission of reports is described in 3g below.				
		Conduct periodic, at least quarterly, quality checks of the recordkeeping and reporting program to verify that the information recorded and reported is thorough, accurate, and consistent with information contained in local records.			Merged with Att 3, paragraph 1f.	Merge
101	Attach 1 3.c.	At a facility or site where DOE regulates worker safety and health, the contractor must ensure that reports for work-related fatalities, injuries, and illnesses to employees of subcontractors who employ 11 or more employees on the DOE work being performed, and who do not meet the criteria in paragraph d(2) below, are recorded in accordance with 29 CFR 1904.4 through 1904.11, 1904.29 through 1904.33 and 1904.46. Reports of recordable injuries and illnesses to subcontractor employees are reported separately for each subcontractor organization in the same manner as described in paragraphs 3b(2) and 3b(3) above for contractor employees, unless consolidation of data is approved by the CAIRS Point of	Att 1 2. <u>Reporting Occupational Safety and Health Information.</u> a. Injury and Illness Recordkeeping and Reporting. (1) Contractors must ensure that work-related fatalities, injuries, and illnesses that occur to their employees and subcontractor employees are recorded and reported accurately and in accordance with 29 C.F.R. §§ 1904.4 through 1904.11, 1904.29 through 1904.32 and 1904.46 and Attachment 3, paragraph 1. This requirement excludes transient and small employer subcontractors. A transient subcontractor does not maintain an onsite office, does not receive direction/oversight from DOE or a DOE contractor, and their work is limited to transient activities, e.g., copy	DOE has exercised its statutory authority to regulate the safety and health of its contractors. DOE requires its contractors to comply with the safety and health recording and recordkeeping requirements in specific sections of 29 CFR 1904. It is important for contractors to capture injuries and illnesses that occur to their subcontractors. It is essential that injuries and illnesses to contractor and subcontractor employees be consistently recorded so that data can be trended and corrective actions implemented to prevent potential injuries and illnesses. Subcontractor data is recorded separately unless consolidated reporting is authorized by DOE. The recording and reporting of injuries and illnesses that occur	Language is clarified. Since the referenced OSHA standards identify employee minimums for reporting, it doesn't need to be repeated here. Reference to Appendix E was removed since it is now contained in CAIRS Injury and Illness Reporting Guide.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
102 Attach 1 3.d.	At a facility or site where DOE regulates worker safety and health, the contractor must ensure that work-related fatal and non-fatal injury and illness cases to subcontractor employees meeting the recording criteria in 29 CFR 1904.4 through 1904.11 and that satisfy either of the two conditions below are submitted according to paragraph 3e below. These cases are not factored into the contractor's injury and illness incidence rates of recordable	machine repair, express mail delivery, bottle water delivery, vending machine repair service. A small employer subcontractor employs less than 10 employees at a DOE site either directly or through sub-tiered contracts. (3) Contractors must ensure separate recording and reporting of all recordable injuries and illnesses occurring to subcontractor employees for each subcontractor organization in the same manner as described in Attachment 3, paragraph 1 for contractor employees, unless consolidation of data is approved by the CAIRS Point of Contact (POC) for the Head of the Headquarters Element or their designated CAIRS POC at the DOE Field organization.	to employees of small employer subcontractors and transient subcontractors are excluded.	While reporting of "small employer subcontractor" and "transient subcontractor" data was required in the past, very little useful data was submitted and developed for analysis.	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
103 Attach 1 3.d.(1)	cases. The two conditions are: The subcontractor employs a total of 10 or fewer employees (including direct hires and those hired through subtier contracts) on the DOE work being performed, or			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
104 Attach 1 3.d.(2)	The DOE work being performed meets all of the following conditions:			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
105 Attach 1 3.d.(2)(a)	the work being performed by the subcontractor is limited to transient activities,			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
106 Attach 1 3.d.(2)(b)	the subcontractor does not maintain an onsite office, and			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
107 Attach 1 3.d.(2)(c)	the subcontractor does not receive direction/oversight from DOE or a DOE contractor (e.g.,			While reporting of “small employer subcontractor” and “transient	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
108 Attach 1 3.e.	copy machine repair, express mail delivery, telephone installation/repair, vending machine service).			subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
	Unless otherwise approved by the Head of the Headquarters Element or their designated point of contact for the DOE Field organization, the contractor will ensure that recordable work-related injury and illness reports are submitted for employees of subcontractors covered by either of the two conditions in paragraph 3d above according to the following requirements:			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	
109 Attach 1 3.e.(1)	Within 7 calendar days of receiving information that an injury or illness has occurred, an injury/illness report will be submitted to CAIRS by using CAIRS Direct Data Entry. [NOTE: These injury/illness reports, which the CAIRS Accident Type will be identified as “non-reportable” (NR) are not factored into the contractor’s injury/illness rates of recordable cases and are available to select CAIRS users for information purposes. Incidence rates and summary information available to CAIRS general users are based on reports of recordable injury and illness cases that meet the			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
	recording criteria established in 29 CFR 1904 and which the Accident Type is identified as either “Injury” or “Illness.”]					
110	Attach 1 3.e.(2)	The injury/illness report, which can be submitted partially complete, must contain the following data elements as described in Appendix C.			While reporting of “small employer subcontractor” and “transient subcontractor” data was required in the past, very little useful data was submitted and developed for analysis.	Delete
111	Attach 1 3.e.(2)(a)	Organization code (See Appendix E for additional information.)			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
112	Attach 1 3.e.(2)(b)	Sub-level code (see Appendix E for additional information.)			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
113	Attach 1 3.e.(2)(c)	Case Number			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
114	Attach 1 3.e.(2)(d)	Date of Injury/Illness			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
115	Attach 1 3.e.(2)(e)	Specific Location			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
116	Attach 1 3.e.(2)(f)	Last Name of Employee			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
117	Attach 1 3.e.(2)(g)	First Name of Employee			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
118	Attach 1 3.e.(2)(h)	Activity Description			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
119	Attach 1 3.e.(2)(i)	Event Description			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
120	Attach 1 3.e.(2)(j)	Nature Description			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
121	Attach 1 3.e.(2)(k)	Body part injured			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
122	Attach 1 3.e.(2)(l)	Person completing form			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
123	Attach 1 3.e.(2)(m)	Accident Type (Accident type must be identified as either a non-reportable injury or a non-reportable illness)			Moved to <u>CAIRS Injury and Illness Reporting Guide</u> .	Delete
124	Attach 1 3.f.	Ensure that new reports (DOE F 5484.3) are submitted at least twice per month for receipt on or before the 15 th of the month and the last working day of the month. Initial reports will include the actual work time lost as of the date the report is submitted. Revisions to lost work time will be submitted quarterly until the case is closed. Quarterly revisions for lost work time and any other information that requires revising information initially reported, will be submitted for receipt by			Merged into Att 3, paragraph 1d.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
125 Attach 1 3.g.	<p>the 10th of the month following the end of the calendar quarter (i.e., April 10th, July 10th, October 10th, and January 10th). Prior to the transition to require electronic reporting only, legible copies of completed report forms may be mailed. Mailed report forms should be addressed to the CAIRS Data Coordinator, U.S. Department of Energy, HS-30/Bldg. 270 CC, 1000 Independence Ave., S.W., Washington, DC 20585-0270. Effective 180 days following the addition of this requirement to the contract, DOE F 5484.3 will be submitted electronically only, using either CAIRS Bulk Upload Processing or by entering information into the electronic form using CAIRS Direct Data Entry.</p>			Merged into Att 3, paragraph 1e.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
	Effective 180 days following the addition of this requirement to the contract, DOE F 5484.4 will be submitted electronically only, by entering information into the electronic form using CAIRS Direct Data Entry. Additional information about accessing CAIRS and electronic report submission is included in Appendix E of DOE M 231.1-1A and on the Internet at the R&R References and Resources Web page (http://www.hss.energy.gov/csa/csp/cairs/refs.html).					
126	Attach 1 3.h.	Ensure that the OSHA Form No. 300A is completed, certified, and posted in the workplace annually. (See requirements in 29 CFR 1904.29, 1904.32, and 1904.44)			Merged into Att 3, paragraph 1c.	Merge
127	Attach 1 3.i.	Accident and related records must be retained, maintained and accessible as follows.				
128	Attach 1 3.i.(1)	A contractor newly assuming occupational safety and health responsibilities for DOE work being performed must accept and maintain already existing records of a prior contractor. A contractor with an expiring or terminating contract must transfer records to the facilities management or follow-on contractor. [See record retention requirements in 29 CFR	Att 1 2. <u>Reporting Occupational Safety and Health Information.</u> a. Injury and Illness Recordkeeping and Reporting. (2) A contractor with an expiring or terminated contract must transfer all occupational safety and health records involving work performed for DOE to the assuming contractor	This requirement is essentially equivalent to 29 CFR 1904.33. Contractors are responsible for analyzing injury and illness data for trends in order to implement corrective actions to reduce or eliminate injuries and illnesses. Some trends develop over time, may be linked to work activities conducted for DOE by the previous contractor, and may not be	Language was clarified to include the requirement to transfer and accept the transfer of records.	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
	1904.33.]	or DOE facilities management. The assuming contractor must accept and maintain these records as part of performing occupational safety and health responsibilities and in accordance with Attachment 3, paragraph 2. (See record retention requirements in 29 C.F.R. § 1904.33 and DOE Administrative Records Schedule 1: Personnel Records, September 2010, Occupational Injury and Illness Files, N1-434-98-4, item 34)	directly linked to only one contractor. Some employees of the outgoing employer may go to work for the new contractor. For these reasons, injury/illness records must be transferred to the contractor assuming the work of a contractor with an expiring or terminated contract. The contractor assuming the work must maintain the records that are transferred in accordance with established requirements.		
129	Attach 1 3.i.(2)	The contractor must ensure that access to accident records is as follows.			
130	Attach 1 3.i.(2)(a)	An employee, former employee, and/or his/her representatives have the right to limited access of the OSHA Form No. 300 that contains the employee's name.		Merged with Att 3, paragraph 2c.	Merge
131	Attach 1 3.i.(2)(b)	Access is subject to the Privacy Act, section 5 U.S.C § 552a and the Freedom of Information Act (FOIA) requirements and restrictions. [See 5 U.S.C. 552(b)(6).] Access to information on any log maintained by a DOE contractor as described in this CRD will be restricted to information that does not constitute an unwarranted invasion of personal privacy. An employee whose name does not appear on		Merged with Att 3, paragraph 2b. Last sentence of original requirement merged with Att 3, paragraph 2c.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments	
132	Attach 1 3.i.(2)(c)	Records listed in 29 CFR 1904.4 and 1904.5 (or the DOE equivalent of these records) must be made available for inspection and copying by any Department of Energy representative for the purpose of conducting oversight assessments or for statistical compilation.			Merged with Att 3, paragraph 2d.	Merge
133	Attach 1 3.i.(3)	Ensure that OSHA Form No. 300 is updated [see 29 CFR 1904.33]. Each quarter for at least one year from the date of the injury/illness, ensure that each DOE F 5484.3 that includes lost work time (either days away from work or days restricted/transferred) is updated to indicate changes in lost work time or changes in the description or outcome of the case.			Requirement to update OSHA 300 merged with Att 3, paragraph 1b. Requirement to update DOE F 5484.3 merged with Att 3, paragraph 1d.	Merge
134	Attach 1 3.i.(4)	Ensure that individuals tasked with occupational injury and illness recording and reporting responsibilities are appropriately			Training requirement merged with Att 3, paragraph 1i. Requirement to obtain	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
135 Attach 1 4.	trained to accomplish the recording and reporting requirements of this CRD and are informed to contact the Office of Corporate Safety Analysis for additional information and assistance in interpretation of requirements contained in this CRD.	<p>Att 1</p> <p>2. <u>Reporting Occupational Safety and Health Information.</u></p> <p>b. Annual Fire Protection Summary Information. Contractors must submit annual fire protection summary information to the Head of the DOE organization in accordance with Attachment 3, paragraph 3 if responsible for maintaining property under the stewardship of DOE, including the Administrator, NNSA.</p> <p>-----</p> <p>Att 3</p> <p>3. <u>Annual Fire Protection Summary Information.</u> A summary of fire protection information for the preceding year must be submitted to the fire protection database by April 30 in accordance with the Annual Fire Protection Summary Information Reporting Guide located at: http://www.hss.doe.gov/CSA/CSA/P/qaps/Annual_Fire_Protection_Summary_Information_Reportin</p>	<p>The data collected in the fire reports enable DOE to carry out its corporate function to analyze and compare programs across DOE and with the private sector. Enhanced analysis will enable DOE to identify trends and determine alternative approaches to manage costs and improve performance.</p> <p>The Annual Fire Protection Summary uses a core set of attributes to monitor DOE fire protection programs and develop a somewhat accurate picture of fire losses. On an annual basis the sites are asked to report fire loss: dollar loss, injuries, root causes, and if suppression systems were activated. A metric is developed which normalizes the data as does the insurance industry. This fire loss rate is monitored site to site and year to year and enables DOE to compare itself against similar industrial facilities and pursue cause prevention strategies.</p>	<p>clarifications of requirements from HSS merged with Att 3, paragraph 1j.</p> <p>Requirements section points to Attachment 3 that contains requirements that are common to DOE federal organizations and contractors. ***** Language was modified to delete responsibilities and add specific web location for reporting guide.</p>	Modify

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
		<p data-bbox="716 228 869 256"><u>g_Guide.pdf</u></p>	<p data-bbox="1136 228 1514 727">Information about suppression system actuations and system types includes the approximate amounts of agent released from a given type of system, root causes and descriptions of event. This information enables DOE to track the reliability of different systems, provide performance data on consensus standard deviations that sites may want to pursue and track system anomalies such as counterfeit parts and product recalls.</p>		
<p data-bbox="71 748 258 808">136 Attach 1 5.</p>	<p data-bbox="302 748 674 841"><u>EPIDEMIOLOGIC ANALYSES—EXCESS INJURIES AND ILLNESSES.</u></p> <p data-bbox="302 846 674 971">Ensure that the following reporting requirements for excessive injuries and illnesses are followed:</p>				
<p data-bbox="71 992 258 1052">137 Attach 1 5.a.</p>	<p data-bbox="302 992 674 1502">Notify the Head of the Field Element of suspected excessive illnesses or injuries that require epidemiologic investigation. Excessive illness or injury means the perception that an unusually high number of cases may be occurring among a group of workers. Epidemiologic analyses can help determine whether suspected illness or injury excesses are greater than expected and are associated with working conditions.</p>			<p data-bbox="1545 992 1797 1328">First sentence is redundant with Att 3, paragraph 1g, which requires the contractor to analyze injury and illness information to identify adverse trends. Remainder of paragraph is explanatory material, not a requirement.</p>	<p data-bbox="1881 992 2032 1019">Delete</p>

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
138 Attach 1 5.b.	Ensure that employees are aware that any worker, individual, or group (e.g., safety and health staff, supervisors, or employee representatives) can identify suspected illness or injury excesses.			This is not a requirement.	Delete
139 Attach 1 6.	<p><u>EPIDEMIOLOGIC ANALYSES—OSH STUDIES.</u> The contractor must ensure DOE authorized investigators, including investigators from the Department of Health and Human Services (DHHS) and Centers for Disease Control and Prevention are provided access to DOE facilities, workers, (contractors and subcontractors), information, and data needed for epidemiologic research projects and related activities addressing worker and community health. Research may require medical test, work place surveys, and review of personnel, medical and exposure records. All investigators are required to comply with Privacy Act and security requirements.</p>			This paragraph is explanatory material, not a requirement.	Delete

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
140 Attach 1 7.	<u>RADIATION EXPOSURE REPORTS TO THE RADIATION EXPOSURE MONITORING SYSTEM (REMS) REPOSITORY.</u> Ensure that the following requirements for radiation exposure monitoring reports are followed:	Att 1 3. <u>Reporting Ionizing Radiation Exposure Information.</u> Contractors must comply with the requirements in Attachment 4, which pertain to reporting ionizing radiation exposure information.	10 C.F.R. Part 825.702(a) requires the maintenance of records to document doses received by individuals under different circumstances and that the records be sufficient to provide dose information necessary to evaluate exposures, evaluate compliance, and provide reports to individuals.	CRD requires the contractor to comply with requirements that are common to federal organizations and contractors listed in Attachment 4.	Modify
141 Attach 1 7.a.	<u>Annual Individual Radiation Exposure Records.</u>				
142 Attach 1 7.a.(1)	DOE contractors will report annual radiation exposure records required by 10 CFR 835.702(a) and (b) to the REMS repository by March 31 for the preceding monitoring year. The records should include exposure records for special individuals as described in paragraph 1b(1) of this chapter.			Requirement still valid. Incorporated in Att 4, paragraph 1a.	Merge
143 Attach 1 7.a.(2)	Revisions to radiation exposure records for monitoring periods beginning on or after January 1, 1989, will be reported to the REMS repository. Revised records for prior monitoring years will be submitted annually by March 31. However, if the revised dose record results in a dose exceeding regulatory dose limits defined in 10 CFR 835.202, revised records will be submitted within 30 days of the date that the dose record is			Requirement still valid. Incorporated in Att 4, paragraph 1b.	Merge

Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
144 Attach 1 7.b.	revised. Revised records should be submitted to the REMS repository in a separate file, but in the same format as annual records. The transmittal documentation should note that the enclosed records are revised.	<u>Radiation Exposure Records for Special Individuals</u>			
145 Attach 1 7.b.(1)	A special individual is a person employed by DOE Headquarters, a contractor supporting DOE Headquarters or Field Office activities, a Defense Nuclear Facilities Safety Board employee or contractor, or an International Atomic Energy Agency inspector who visits a DOE or DOE contractor site or facility to conduct Department-related business. Radiation exposure data pertaining to special individuals will be reported to the REMS repository within 30 days after the determination of the dosimetry.			Requirement still valid. Incorporated in Att 4, paragraph 2a.	Merge
146 Attach 1 7.b.(2)	Each DOE contractor employee or a special individual who visits in an official capacity, a radiological site outside of the DOE shall arrange to have all pertinent occupational radiological exposure data to his or her employer within 30 days after determination of the dosimetry.			Requirement still valid. Incorporated in Att 4, paragraph 2b.	Merge

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
147	Attach 1 7.b.(3)	DOE contractors shall ensure that such procedures exist and are effective in support of paragraph 1b(2) above.			Requirement still valid. Incorporated in Att 4, paragraph 2c.	Merge
148	Attach 1 7.c.	<u>Report Format</u> . All radiation exposure reports sent to the REMS repository as noted in paragraphs 1a and 1b must be submitted in electronic format and must be prepared in accordance with Appendix G of this Manual.			Requirement still valid. Incorporated in Att 4, paragraph 3.	Merge
149	Attach 1 7.d.	<u>Exposure Reports to Individuals</u> . Reports to individuals must be prepared in accordance with 10 CFR 835.801.			Requirement still valid. Incorporated in Att 4, paragraph 4.	Merge
150	Appendix A Page A-1 through A-2	<u>Acronyms</u>			Acronyms associated with various functional areas were moved to web-based reporting guides.	Delete
151	Appendix B Page B-1 (and B-2)	<u>OSHA FORMS 300 and 300A</u>			Moved to CAIRS Injury and Illness Reporting Guide. Forms and information are also generally available on OSHA's recordkeeping website.	Delete
152	Appendix C page C-1	<u>INDIVIDUAL ACCIDENT/INCIDENT REPORT – DOE F5484.3</u>			Moved to CAIRS Injury and Illness Reporting Guide.	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
153	Appendix C page C-1 through C-6	<u>Table C-1 Individual Accident/Incident Report Data Elements</u>			Moved to CAIRS Injury and Illness Reporting Guide.	Delete
154	Appendix D page D-1	<u>TABULATION OF WORK HOURS – DOE F 5484.4</u>			Moved to CAIRS Injury and Illness Reporting Guide.	Delete
155	Appendix D.1 page D-1	<u>Table D-1. Tabulating Work Hours</u>			Moved to CAIRS Injury and Illness Reporting Guide.	Delete
156	Appendix D.2 page D-2	<u>Instructions for Estimating Hours Worked</u>			Moved to CAIRS Injury and Illness Reporting Guide.	Delete
157	Appendix E page E-1	<u>ACCESSING CAIRS AND OBTAINING ORGANIZATION CODES</u>			Moved to CAIRS Injury and Illness Reporting Guide	Delete
158	Appendix E.1 Page E-1	<u>Accessing CAIRS</u>			Moved to CAIRS Injury and Illness Reporting Guide	Delete
159	Appendix E.2 page E-1	<u>Obtaining Organization Codes and Sub-Level Codes</u>			Moved to CAIRS Injury and Illness Reporting Guide	Delete
160	Appendix E.3 page E-2	<u>Electronic Reporting</u>		CAIRS Injury and Illness Reporting Guide	Moved to CAIRS Injury and Illness Reporting Guide	Delete
161	Appendix F	<u>ANNUAL FIRE PROTECTION SUMMARY</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
162	Appendix F.1 Page F-1	<u>Summary of Fire Loss Damage Incidents</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
163	Appendix F.2 Page F-2	<u>Non-Fire Incidents Actuating Automatic Fire Suppression Systems</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
164	Appendix F.3 Page F-3	<u>Halon Reduction Activities</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
165	Appendix F.4 Page F-4	<u>Fire Protection Inspection Testing and Maintenance Activities</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
166	Appendix F.5 Page F-5	<u>Fire Department Activities</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
167	Appendix F.6 Page F-6	<u>Recurring Fire Protection Program Costs</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
168	Appendix F.7 Page F-6	<u>Performance Evaluation</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
169	Appendix F.8 Page F-8	<u>Criteria for Cost Estimating</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
170	Appendix F.9 Page F-8	<u>Criteria for Loss Estimation</u>			Moved to Annual Fire Protection Summary Information Reporting Guide	Delete
171	Appendix G	INSTRUCTIONS FOR PREPARING OCCUPATIONAL EXPOSURE DATA FOR SUBMITTAL TO THE RADIATION EXPOSURE MONITORING SYSTEM (REMS) REPOSITORY			Moved to REMS Reporting Guide.	Delete
172	Appendix G.1 page G-1	Transmittal Letter			Moved to REMS Reporting Guide.	Delete
173	Appendix G.2 page G-1	Media Requirements			Moved to REMS Reporting Guide.	Delete
174	Appendix G.13 page G-2 through G-7	Instructions for Preparing Electronic Occupational Exposure Data Submittals			Moved to REMS Reporting Guide.	Delete
175	Appendix G.4 page G-7	Occupational Exposure Data Summary Explanation			Moved to REMS Reporting Guide.	Delete
176	Appendix G.5 page G-8	Bioassay and intake Summary File Explanation			Moved to REMS Reporting Guide.	Delete
177	Appendix G.6 page G-10	Facility Code Types			Moved to REMS Reporting Guide.	Delete

	Citation	Requirement	Revised Requirement	Basis for Requirement	Basis for Decision	Comments
178	Appendix G.7 page G-11 through G-15	Facility Phase of Operation Codes			Moved to REMS Reporting Guide.	Delete