

#	M 231. 1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
1.	Attach ment 2	Regardless of the performer of the work, the contractor is responsible for compliance with the requirements of this CRD. The contractor is responsible for flowing down the requirements of this 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 will both ensure that it and its subcontractors comply with the requirements of this CRD and only incur costs that would be incurred by a prudent person in the conduct of competitive business.	Regardless of the performer of the work, the contractor (including DOE direct contractors) is responsible for compliance with the requirements of this Contractor Requirements Document (CRD) and attachments 2, 3, 4,5 and 6, and for flowing down the these requirements to subcontractors at any tier to the extent necessary to ensure the contractor's compliance with the requirements. References to a DOE directive in this CRD or in its attachments refer to the CRD associated with the referenced DOE directive. The contractor must meet the following requirements.	Flow down language is necessary to ensure that requirements are passed down from the prime to any subcontractors.	Simplified text.	Changed.		Attach ment 1
2.	1	<b>OCCURRENCE REPORTING</b>	<u>GENERAL REQUIREMENTS</u>		Title change.	Changed.		<b>1</b>
3.	1	For reportable occurrences, contractors must categorize the occurrences, notify DOE as required, and prepare and submit Occurrence Reports. At sites with more than one facility management contractor, contractors may make arrangements for one of the contractors to prepare and submit reports for the entire site. However, each contractor is responsible for ensuring that Occurrence Reports are submitted for activities within its scope of work.	For reportable occurrences, contractors must categorize the occurrences, notify DOE as required, and prepare and submit Occurrence Reports. At sites with more than one facility management contractor, contractors may make arrangements for one of the contractors to prepare and submit reports for the entire site.	Occurrences that affect the health safety, etc. of DOE operations must be reported to DOE management. This is a critical corporate function that must be maintained. Contractors at a site must determine reporting responsibilities	No change.	Retained.		1a

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			However, each contractor must ensure that Occurrence Reports are submitted properly for activities within its scope of work.	to ensure proper notifications are made.				
4.	1	The documentation and distribution requirements will be satisfied by utilization of a centralized unclassified DOE operational database, the computerized Occurrence Reporting and Processing System (ORPS). However, under no circumstances will Occurrence Reports containing classified information or Unclassified Controlled Nuclear Information (UCNI) be entered into the ORPS database. Requirements regarding security classification are provided in Section 3.	The documentation and distribution requirements must be satisfied by using DOE's centralized unclassified operational database, the computerized Occurrence Reporting and Processing System (ORPS).	The ORPS database must be used for ORPS reporting to ensure all data is captured in a centralized database for analysis and complete reporting. Security requirements are in Attachment 1- 2 and Attachment 4 – 1.	Made some modifications.	Changed..		1b
5.	1	Occurrences involving foreign personnel, governments, organizations, entities or influence must be reported by the contractor to the Office of Counterintelligence or the Office of Defense Nuclear Counterintelligence, as appropriate. Such reporting is not intended to interfere with or delay any actions directed toward protection of personnel or property.	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) must not be entered or referenced in the ORPS database.	This requirement ensures proper reporting when occurrences involve foreign governments.	No change.	Retained.		Attach ment 4 – 1.c.
6.	1.2	Local implementing procedures may increase the reporting requirements but may not decrease the requirements below.	Local implementing procedures may specify additional learning and reporting requirements beyond those stated in this CRD, but must at a minimum include all requirements of this	Requirements in this Directive are minimum requirements.	Moved statement to General Requirements for visibility.	Changed.		1c

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			CRD.					
7.			<u>SPECIFIC REQUIREMENTS</u>		New header	Added.		3
8.	1.1	<u>Event or Condition Identification</u>	<u>Event or Condition Identification</u>		No change.	Retained.		3a.
9.	1.1.a	The contractor may identify occurrences by direct observation of equipment or process malfunctions, log or record reviews, operator recognition of their own or others' errors, or other means.	Identify abnormal or emergency conditions based on local processes and procedures that implement requirements of DOE O 422.1, <i>Conduct of Operations</i> , and DOE 151.1C, <i>Comprehensive Emergency Management System</i> . Ensure that the requirements of this CRD for reporting are initiated for events specified in the Occurrence Reporting Criteria (Attachment 2). Ensure that reporting does not interfere with operations personnel taking appropriate actions to stabilize and/or place the facility/operation in a safe condition upon discovery of an abnormal event or condition.	Referred to other Orders for how occurrences can be identified.	The current version gives ideas of how things "may" be identified. The value is questionable . Therefore a reference to other Orders seems more appropriate.	Changed.	DOE O 422.1 and DOE 151.1 C	3a.
10.	1.1.b	The contractor must take appropriate immediate action to stabilize and/or place the facility/operation in a safe condition and ensure that any potential environmental effects are stabilized and workers are treated for injuries sustained. Also, actions should be taken to preserve conditions for continued investigation; however, these actions are not to interfere with establishing a safe condition.	Modified and included in new 3a.	It is important to make sure that the event site is secured prior to initiating reporting activities.	Slight word change.	Moved.		

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11.	1.1.c	The contractor must, upon identification of an abnormal or suspected abnormal event or condition, promptly notify the appropriate contractor line management of the event status and record and/or archive all pertinent information, including details concerning the discovery of the occurrence and actions taken to stabilize or place the facility/operation in a safe condition.	Deleted.	N/A	The Orders referenced in 1.1.a better define the requirements. Implementation of the requirements is determined by each site.	Deleted.		
12.	1.2	<u>Event or Condition Categorization.</u>	<u>Event or Condition Categorization.</u>		No change	Retained.		3b
13.	1.2	The contractor must categorize all occurrences, except Operational Emergencies, within 2 hours of discovery following the site/facility-specific procedures developed in accordance with this CRD. The significance categories [outlined in the Occurrence Reporting Model, Section 11 of DOE M 231.1-2] are for those occurrences of interest for complex-wide occurrence reporting and are described very generally below. More definitively, Reporting Criteria, listed in Section 2 below, provide very specific reporting criteria and assigns the appropriate significance category to each criterion. Local implementing procedures may increase the reporting requirements but may not decrease the requirements below.	Events and conditions must be categorized in accordance with the Occurrence Reporting Criteria (Attachment 2) and within the timeframes specified in the Occurrence Reporting Model (Attachment 4), or as soon thereafter as reasonably possible.	Necessary to support ORPS process.	The proposed Order moves the Model to Attachment 4 and the Reporting Criteria to Attachment 2.  The language describing the different significance categories is removed.	Changed.	Attachment 2 and 4	3.b
14.	1.2.a	<u>Operational Emergencies (OE).</u> Operational Emergency Occurrences are the most serious occurrences and require an increased alert status for onsite personnel and, in specified cases, for offsite authorities. [Operational Emergencies are defined in DOE O 151.1A, <i>Comprehensive Emergency Management System</i> . The prompt notification requirements, definitions, criteria, and classifications of operational	Operational Emergency (OE) as defined in DOE O 151.1C: Major unplanned or abnormal events or conditions that: involve or affect DOE/NNSA facilities and activities by causing, or having the potential to cause, serious health and safety or	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.	DOE O 151.1A	Attachment 2 – 1.b.

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		emergencies and appropriate responses are provided in DOE O 151.1A.] Written Occurrence Reports, however, must be completed in accordance with this CRD.	environmental impacts; require resources from outside the immediate/affected area or local event scene to supplement the initial response; and, require time-urgent notifications to initiate response activities at locations beyond the event scene. Operational Emergencies are the most serious occurrences and require an increased alert status for onsite personnel and, in specified cases, for offsite authorities.					
15.	1.2.b	<u>Significance Category 1.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>significant impact</i> on safe facility operations, worker or public safety and health, regulatory compliance, or public/business interests.	Significance Category 1: Non-OE events that caused actual harm; posed the potential for immediate harm or mission interruption due to safety system failure and required prompt mitigative action; or constituted an egregious noncompliance with regulatory requirements that created the potential for actual harm or mission interruption.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.c.
16.	1.2.c	<u>Significance Category R.</u> Occurrences in this category are those identified as recurring, as determined from the periodic performance analysis of occurrences across a site.	Significance Category R: Recurring occurrences are those identified as recurring, either directly or through periodic analysis of occurrences and other non-reportable events.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.g.

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17.	1.2.d	<u>Significance Category 2.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>moderate impact</i> on safe facility operations, worker or public safety and health, regulatory compliance, or public/business interests.	Significance Category 2: Circumstances that reflected degraded safety margins—necessitating prompt management attention along with modified normal operations—to prevent an adverse effect on safe facility operations; worker or public safety and health, including significant personnel injuries; regulatory compliance; or public/business interests.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.d.
18.	1.2.e	<u>Significance Category 3.</u> Occurrences in this category are those that are not Operational Emergencies and that have a <i>minor impact</i> on safe facility operations, worker or public safety and health, regulatory compliance, or public/business interests.	Significance Category 3: Events or circumstances with localized implications including personnel injury, environmental releases, equipment damage or hazardous circumstances that were locally contained and did not immediately suggest broader systemic concerns.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.e.
19.	1.2.f	<u>Significance Category 4.</u> Occurrences in this category are those that are not Operational Emergencies and that have <i>some impact</i> on safe facility operations, worker or public safety and health, public/business interests.	Significance Category 4: Events or circumstances that were mitigated or contained by normal operating practices, but where reporting provides potential learning opportunities for others.	Necessary to support ORPS process.	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Changed and moved.		Attach ment 2 – 1.f.
20.	1.2	If the consequences are not fully determined or the event exceeds the threshold of more than one criterion (listed in Section 2 below), then the event must be categorized at the higher criteria	Events or conditions must be initially categorized according to the Reporting Criteria in Attachment 2. The	Necessary to support ORPS process.	Some changes to reference Attachment 2.	Changed and moved.	Attac hmen t 4	Attach ment 4 - 2

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		level being considered. The occurrence criterion must be elevated, maintained, or lowered, as information is made available.	occurrence criterion and/or Significance Category for the incident must be reevaluated and changed as new information becomes available.					
21.	1.3	<u>DOE HQ Operations Center Prompt Notifications.</u>	<u>Prompt Notifications</u>		Slight title change.	Changed.		3c
22.	1.3.1	<u>Operational Emergencies.</u> If an event has been declared an Operational Emergency, the contractor will be responsible for the written Notification Report and for the completion of all other occurrence reporting requirements, as described below. [The requirements for the prompt and follow-up notifications to DOE and other agencies and the appropriate emergency responses to be taken are provided in DOE O 151.1A, <i>Comprehensive Emergency Management System</i> . The specific procedures on how these events are categorized and how and when DOE is notified are included in the site/facility-specific emergency response plans or procedures. ]	Prompt Notifications, as determined by the Occurrence Reporting Criteria (Attachment 2), must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4).	This section outlines the reporting responsibilities and links these to a reporting model to ensure consistent and timely reporting.	Reworded to address all Prompt Notifications together and refer to the appendices that provide the detail.	Changed.		3c
23.	1.3.2	<u>Prompt Notifications for Significance Category 1, 2, 3, and 4 Reportable Occurrences.</u>	Deleted		Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Deleted	
24.	1.3.2.a	The contractor must notify the DOE Facility Representative (an individual designated by the Head of the Field Element/Operations Organization) in a manner determined locally and the DOE Headquarters Operations Center (DOE HQ OC), as required, of the following reportable occurrences .as soon as practical (i.e., promptly), but no later than 2 hours after categorization.	Deleted.	N/A	Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.	Attachment 4.	

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25.	1.3.2.a (1)	All Significance Category 1 occurrences require a prompt notification to the Facility Representative and DOE HQ OC.	Deleted		Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.		
26.	1.3.2.a (2)	All Significance Category 2 occurrences require a prompt notification to the Facility Representative and, if directed by the Facility Representative, to the DOE HQ OC.	Deleted		Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.		
27.	1.3.2.a (3)	All Significance Category 3 occurrences require a prompt notification to the Facility Representative.	Deleted		Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.		
28.	1.3.2.a (4)	Additionally, specific Significance Category 2, 3, and 4 occurrences (identified as requiring prompt notification with an asterisk in the reporting criteria listed in Section 2 below) require prompt notification to the Facility Representative and DOE HQ OC.	Deleted		Specifics are already contained in the Occurrence Reporting Model, Attachment 4.	Deleted.		
29.	1.3.2.b	The contractor may use the local Field/Site Emergency Operations Center to expedite establishing the communication link required and to record and archive conversations. The prompt notification process is, as follows:	The local Field/Site Emergency Operations Center may be used to expedite establishing the communication link required and to record and archive conversations.	Information.	Some verbiage change.	Changed and moved.		Attach ment 4 – 3.a.
30.	1.3.2.b (1)	The contractor must e-mail the prompt notification of the reportable occurrence to the DOE HQ OC, and follow up with a phone call to the DOE HQ OC to ensure receipt of the e-mail and to clarify any areas that may not be clear.	The prompt notification must be e-mailed to the DOE HQ OC and receipt must be confirmed.	Necessary to support ORPS process.	Correct as written.	Retained and moved.		Attach ment 4 – 3.b.1).

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31.	1.3.2.b (2)	The Prompt Notification must clearly state/select the Significance Category (1, R, 2, 3, or 4) and identify the specific reporting criteria associated with the occurrence.	All of the reporting criteria (i.e., including the Group, Subgroup and Sequence Numbers) associated with the occurrence	This information is included in the next requirement.	Changed to be stated more simply.	Changed and moved.		Attach ment 4 – 3.b.2)
32.	1.3.2.b (3)	Prompt Notification to the DOE HQ OC must include information on the following items:	The Prompt Notification must include information on the following items, as applicable:	Preamble.	Changed to add “as applicable,” since not everything included in the list will apply in every case.	Changed and moved.		Attach ment 4 – 3.b.2)
33.	1.3.2.b (3)a	Occurrence Significance Category	Occurrence Significance Category	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
34.		New.	All of the reporting criteria (i.e., including the Group, Subgroup and Sequence Numbers) associated with the occurrence	Necessary to support ORPS process.	New.	New.		Attach ment 4 – 3.b.2)
35.	1.3.2.b (3)b	Location and description of the event	Location and description of the event.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
36.	1.3.2.b (3)c	Date and time of discovery	Date and time of discovery.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
37.	1.3.2.b (3)d	Damage and casualties	Damage and casualties.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
38.	1.3.2.b (3)e	Impact of event on other activities and operations	Impact of event on other activities and operations.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
39.	1.3.2.b (3)f	Protective actions taken or recommended	Protective actions taken or recommended.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)
40.	1.3.2.b (3)g	Weather conditions at the scene	Weather conditions at the scene.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attach ment 4 – 3.b.2)

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41.	1.3.2.b (3)h	Level of media interest at scene/facility/site.	Level of media interest at scene/facility/site.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attachment 4 – 3.b.2)
42.	1.3.2.b (3)i	Other notifications made	Other notifications made.	Necessary to support ORPS process.	Remains the same.	Retained and moved.		Attachment 4 – 3.b.2)
43.	1.3.2.b (4)	All information should be clear and succinct. Avoid jargon. Uncommon or site/facility-specific abbreviations and acronyms should be fully described.	Deleted.	N/A	This is common writing practice and should be followed without a requirement.	Deleted.		
44.	1.3.2.b (5)	The contractor must follow the appropriate security procedures if the notification to DOE may contain classified or sensitive information.	Deleted.	N/A	The security expectations are stated in CRD 2 and Attachment 4 – 1.	Deleted.	CRD 2 and Attachment 4 – 1.	
45.	1.3.2.b (6)	If the occurrence is recategorized, then the occurrence must be reconsidered for prompt notification. If appropriate, the contractor must notify the Facility Representative and the DOE HQ OC as soon as practical, but within the prompt notification time requirements of the new Significance Category for the recategorized occurrence and provide the Occurrence Report number.	If the occurrence is recategorized, then the occurrence must be reconsidered for prompt notification and, as appropriate, the same prompt notification process stated above must be followed.	Necessary to support ORPS process.	Changed to be stated more simply.	Changed and moved.		Attachment 4 – 3.c.
46.	1.3.2.b (7)	Follow-up notifications must be made to DOE for any further degradation in the level of safety or impact on the environment, health, or operations of the facility or other worsening conditions subsequent to the previous notification. If a degradation results in upgrading the event to an Operational Emergency, the DOE HQ OC must be notified. [See DOE O 151.1A, <i>Comprehensive Emergency Management System.</i> ]	Follow-up notifications must be made for any further degradation in the level of safety or impact on the environment, health, or operations of the facility or other worsening conditions subsequent to the initial notification.	Necessary to support ORPS process.	Changed to be stated more simply.	Changed and moved.		Attachment 4 – 3.d.
47.	1.4	<u>Written Notification Report.</u> The contractor must prepare the written Notification Report (including all required fields and	<u>Written Notification Report.</u> A written Notification Report must be submitted	Necessary to support ORPS process.	Changed to eliminate the reference to	Changed and moved.	Previous reference:	Attachment 4 – 4.

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		all other fields for which information is known) [described in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> ] and distribute it per Section 1.6.e below. Direct entry into the computerized Occurrence Reporting and Processing System (ORPS) satisfies this requirement.	into the computerized Occurrence Reporting and Processing System (ORPS) within the timeframe specified in this Order, or as soon thereafter as reasonably possible.		the Guide and state the requirements more simply.		DOE G 231.1-1	
48.	1.4	Any changes in the reporting criteria of the occurrence, which result in a change, either lower or higher, to the Significance Category, must be documented in an Update Report and submitted within the timeframe required for the Notification Report under the new Significance Category. A discussion on the change in categorization must be included in the Description of Occurrence field in the Update Report.	Any changes to the occurrence reporting criteria that result in a change to the Significance Category, either lower or higher, must be documented in an Update Report and submitted within the timeframe required for the Notification Report under the new Significance Category as described in this Order. A discussion of the change in category must be included in the Update Report at the end of the "Description of Occurrence" field.	Necessary to support ORPS process	Minor verbiage changes.	Changed and moved.		Attachment 4 – 5.a.
49.		New.	<u>Occurrence Report Processing.</u> Occurrence reports must be processed in accordance with the expectations outlined in the Occurrence Report Preparation (Attachment 3) and Occurrence Reporting Model (Attachment 4).	Necessary to support ORPS process.	New lead in paragraph establishing requirement to prepare ORPS reports in accordance with the ORPS model (Attachment 4). This paragraph also points to writing requirements that are common to	New.		4.d

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					feds and contractors in Attachment 3.			
50.	1.4.1	<u>Occurrence Report Preparation.</u> In preparing the Notification Report, and subsequently the Final Report, the following writing instructions must be followed:	<b>Occurrence Report Preparation</b> Notification, Update, and Final Reports must be written clearly and concisely so the general reader can understand the basic “who, what, when, where, how” of the event; the safety issues involved; and the actions taken. The following instructions apply:	Necessary to support ORPS process.	Language clarified and combined overall writing requirement from 5.4.1 a	Changed and moved.		Attachment 3 header .
51.	1.4.1.a	The report should enable the general reader to understand the basic “what, who, when, where, how” of the event, the safety issues involved, and the actions taken.	Merged with paragraph above.		Merged.	Merged and moved.		Attachment 3.
52.	1.4.1.b	The Subject/Title and the first paragraph of the Occurrence Description should relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style).	The Subject or Title of Occurrence and the first paragraph of the Description of Occurrence must relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style). Subsequent paragraphs must contain the background and description of the event at a sufficient level of detail for the reader to understand what happened and the resulting consequences and actions.	Necessary to support ORPS process.	Language clarified and combined level of detail requirement from 5.4.1 d	Merged and moved.		Attachment 3 – 1.
53.	1.4.1.c	All information should be clear and succinct. Avoid redundant and unnecessary text, and lengthy “log book” accounts, unless a discussion of the event in chronological order is considered	Notification, Update, and Final Reports must be written clearly and concisely so the general reader can understand the	Necessary to support ORPS process.	Language clarified and combined overall writing requirement	Changed and moved.		Attachment 3 header .

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		essential to understanding the event.	basic “who, what, when, where, how” of the event; the safety issues involved; and the actions taken. The following instructions apply:		from 5.4.1 a			
54.	1.4.1.d	Complex and more significant occurrences should warrant a greater level of detail. Significance Category 4 occurrences would likely need only a short paragraph under Occurrence Description. However, all reports should present enough information so that the general reader understands why the event needs to be reported and what the effect is.	The Subject or Title of Occurrence and the first paragraph of the Description of Occurrence must relay the essential nature of the event (i.e., a summary of the occurrence in newspaper style). Subsequent paragraphs must contain the background or description of the event at a sufficient level of detail for the reader to understand what happened and the resulting consequences and actions.	Necessary to support ORPS process.	Combined with detailed writing requirement in Att 3 paragraph 1.	Merged and moved.		Attach ment 3 – 1.
55.		New.	Final Reports must contain the significance, nature, and extent of the event or condition if this information is not already in the Notification or Update Report.	Necessary to support ORPS process.	Requirement added to ensure important information is included in report so that nature of occurrence can be properly understood.			Attach ment 3 - 2.
56.		New.	Final Reports must contain the causes of the event or condition (including the root cause, as required) using the codes provided in the Causal Analysis Tree (Attachment 5).	Necessary to support ORPS process.	Requirement added to ensure the causes are identified from the causal analysis tree and reported.			Attach ment 3 – 3.

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57.		New.	Final reports must also include the immediate actions taken (if not already in the Notification Report), the corrective action(s) to be taken, and any lessons learned developed for the event, as required by the Occurrence Reporting Model (Attachment 4).	Necessary to support ORPS process.	Requirement added to ensure that immediate corrective actions and lessons learned are reported as required by the ORPS reporting model.			Attachment 3 – 4.
58.		New.	Reports on suspect/counterfeit and defective items or material, must provide the manufacturer/supplier/vendor (including a contact, phone number, and website), the model and part numbers, the quantity found, why the item/material is suspect/counterfeit or defective, and how the item/material is being used. Reports must also include the method of detection (i.e., receipt inspection, craft inspection prior to installation, in-service inspection, or failure) and identify any resulting consequences, along with any photos via hyperlink, as appropriate (see 7 below).	Necessary to support ORPS process.	Requirement added to ensure that appropriate information concerning suspect/counterfeit and defective items are captured and reported.			Attachment 3 – 5.
59.	1.4.1.e	Avoid jargon and uncommon or site/facility-specific abbreviations and acronyms. If used, acronyms should be initially spelled out.	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing.	Deleted.		

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					It does not pertain to what should be reported. This type of report writing guidance is general in nature; some of it can be found in the Occurrence Report Writer's Guide.			
60.	1.4.1.f	Unless necessary to record and explain the event (e.g., suspect/counterfeit items or material), use general descriptions of equipment, procedures, etc., rather than presenting lengthy detailed titles and the numbers and letters assigned to those items.	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing. It does not pertain to what should be reported. This type of report writing guidance is general in nature; some of it can be found in the Occurrence Report Writer's Guide.	Deleted.		
61.	1.4.1.g	Quantify the level of contamination, dose, release, and damage (e.g., estimate the acres of wild land burned) when possible, instead of merely stating a reportable limit was exceeded.	Reports must quantify the level of contamination, dose, exposure, release, and damage (e.g., estimate the acres of wild land burned) when possible, instead of merely stating a reportable limit was exceeded.	Necessary to support ORPS process.	Language clarified.	Changed and moved.		Attachment 3 – 6.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
62.	1.4.1.h	Use active rather than passive voice whenever possible. For example, write, “ <i>the electrician</i> severed the conduit” rather than “the conduit was severed.”	Deleted.	N/A	This information pertains to how a report is written, involving the mechanics of writing. It does not pertain to what should be reported. This type of report writing guidance is general in nature; some of it can be found in the Occurrence Report Writer’s Guide.	Deleted.		
63.	1.4.1.i	When appropriate for clarification, photos, sketches, and drawings must be maintained with the ORPS occurrence report record. In addition, sites are encouraged but not required to make photos, sketches, and drawings available via a Web page, with the Web page address included as a hyperlink in the ORPS report.	Photos, sketches, drawings, and witness statement interview notes must be maintained with the occurrence report record when appropriate for clarification. In addition, sites are encouraged, but not required, to make photos, sketches, and drawings available via a Webpage, with the Webpage address included in the ORPS report.	Necessary to support ORPS process.	Language clarified.	Changed and moved.		Attachment 3-7.
64.	1.4.2	<u>Notification Report Submittal Schedule.</u> The written Notification Report must be submitted according to the following schedule:	<u>Written Notification Report.</u> A written Notification Report must be submitted into the computerized Occurrence Reporting and Processing System (ORPS) within the timeframe specified	Necessary to support ORPS process.	The ORPS Model is moved to Attachment 4 of the proposed order and the text has been streamlined to point to	Changed and moved.		Attachment 4 – 4.

#	M 231. 1-2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
			in this Order, or as soon thereafter as reasonably possible.		the model.			
65.	1.4.2.a	Reports for Operational Emergencies and Significance Category 1 Occurrences. Before the close of the next business day from the time of categorization (not to exceed 80 hours).	Deleted.		This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
66.	1.4.2.b	Reports for Significance Categories R and 2 Occurrences. Before the close of the next business day from the time of categorization.	Deleted.		This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
67.	1.4.2.c	Reports for Significance Category 3 Occurrences. No later than close of business on the second business day from the time of categorization.	Deleted.		This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
68.	1.4.2.d	Reports for Significance Category 4 Occurrences. Only a Short Form Report is required by close of business the second business day from the time of categorization.	Deleted.		This provision is captured in Attachment 4 of the proposed order and therefore does not need to be duplicated here.	Deleted.		
69.	1.5	<u>Occurrence Investigation and Analysis</u> . The following steps describe an acceptable process for	<u>Occurrence Investigation and Analysis</u> .	Necessary to support ORPS process.	Removed reference and pointed	Changed.	DOE 5480.19	3.e

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		submitting Update Reports and conducting the investigation and analysis of a specific occurrence. [DOE 5480.19, <i>Conduct Of Operations Requirements For DOE Facilities</i> , and DOE-STD-1045-93, <i>Guide to Good Practices for Notifications and Investigation of Abnormal Events</i> , should be considered when establishing a program for investigation of occurrences. In cases of conflict between DOE 5480.19 or DOE-STD-1045-93 and this CRD, the requirements of this CRD must be followed.]	Occurrences must be investigated and analyzed, as described in the Occurrence Reporting Model (Attachments 4), and causes provided using the causes listed in the Causal Analysis Tree (Attachment 5).		to the requirements in Attachment 4 and the Causal Analysis Tree in Attachment 5.		DOE-STD-1045-93 has been updated to O 422.1.	
70.	1.5	In general, the investigative process is used to gain an understanding of the occurrence, its causes, and the corrective actions necessary to prevent recurrence or only remedy the problem, based on the significance of the occurrence. If DOE is doing a Type A or B investigation [defined in DOE O 225.1A], the contractor is not required to perform an identical investigation. [However, the contractor is still required to do the preliminary assembly of information to turn over to the DOE Accident Investigation Board, in accordance with DOE O 225.1A, <i>Accident Investigation</i> .]	General. The purpose of occurrence investigation and analysis is to understand and identify the causes (both individual and organizational) that contributed to the occurrence so those deficiencies can be addressed and corrected. Analyzing occurrence reports promotes the values and concepts of a learning organization envisioned in the Integrated Safety Management (ISM) Feedback and Improvement function, including performance monitoring; identifying deviations or questionable conditions; self-assessing; and using quality analysis to improve. In order to achieve the ISM goal, organizations must learn from occurrences and near misses and go beyond surface level	Necessary to support ORPS process.	Expanded on the guidance on how to investigate and analyze occurrences.	Changed and moved.		Attachment 4 – 8.a.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
			causal analysis to understand how the underlying sources of operational vulnerability combined to produce unintended or undesired results. An occurrence analysis must explain how failure(s) emerged from a normally safe and reliable system to provide the understanding required to improve systems and processes and prevent future accidents.					
71.	1.5.a	The contractor should use a graded approach [described in the Occurrence Reporting Model, Section 11 of DOE M 231.1-2] when determining the level of effort required for the investigation into the causes of the occurrence. This graded approach is based on the significance, severity, or risk associated with the event or condition.	Graded Approach. Occurrences must be investigated and analyzed using a graded approach in accordance with locally approved quality and issues management procedures. Facility Managers must consider the significance or potential significance (e.g., Significance Category) of the event when choosing the scope and tools to use in the investigation. The investigation and analysis methodology(ies) must be included in the report's "Description of Cause" field.	Necessary to support ORPS process.	Expanded on the guidance on how to investigate and analyze occurrences.	Changed and moved.		Attach ment 4 – 8.b.
72.	1.5.a	For Operational Emergencies, in general, the investigation, problem analysis, and corrective action process should parallel the process for Significance Category 1 occurrences. However, the	Deleted		Removed and referenced the Occurrence Reporting	Deleted.	Attac hmen t 4	

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		<p>contractor should consider a graded approach when determining the level of effort for the investigation into the cause of the Operational Emergency. For this purpose, the graded approach is based on whether the Operational Emergency was directly caused by DOE operations or resulted from non-DOE operations or natural phenomena. For example, investigations of an Operational Emergency involving the release of hazardous materials might require an accident investigation or the assembly of a team of investigators and subject matter experts. Investigation of an Operational Emergency resulting from a DOE facility being required to implement protective actions because a non-DOE activity offsite released hazardous materials or an Operational Emergency resulting from an earthquake may not require root cause determination because the initiating event was clearly beyond DOE’s control.</p>			<p>Model, Attachment 4.</p>			
73.	1.5.b	<p>All causes must be identified as required and included in the occurrence report. [See the Occurrence Reporting Model, Section 11 of DOE M 231.1-2. The cause codes to be used for reporting are provided in the Causal Analysis Tree, also in Section 11. Guidance on selecting the appropriate cause code is provided in DOE G 231.1-2, <i>Occurrence Reporting Causal Analysis Guide</i>.] The Cause Description field should include a brief discussion to clearly link the event to the cause code(s). For those occurrences that require a formal root cause analysis, any of the site approved root cause analysis methodologies are permitted. The methodology used must be included in the Cause Description field of the occurrence report. Additionally,</p>	<p>Causal Analysis Documentation. Causes must be identified and appropriately documented in accordance with the Causal Analysis Tree (Attachment 5). The “Description of Cause” field must include a brief discussion that clearly links the event to the cause code(s) and resulting corrective actions. In addition, any discussion of the facility’s implementation of the ISM program must be identified and entered in the “Description of Cause” field.</p>	<p>Necessary to support ORPS process.</p>	<p>Removed text referring to Guide that was removed from reference list.</p>	<p>Changed and moved.</p>		<p>Attachment 4 – 8,c.</p>

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		the Cause Description Field must include a brief discussion to describe the linkage of the identified cause codes to the associated causal factors for the event. In addition to determining the causes of the occurrence, any weaknesses in the facility's implementation of the ISM program must be identified and entered in the ISM field, as discussed in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> .						
74.	1.5.c	In addition to submitting an Update Report when the Significance Category of the occurrence has been changed (as stated in Section 1.4), the contractor must submit and distribute an Update Report for all occurrences, with the exception of Significance Category 4 occurrences, if there is any significant and new information about the occurrence. The status of the investigation, recurring consequences, and the identification of additional component defects are activities associated with the occurrence and must be included in Update Reports.	An Update Report must be submitted for all occurrences, with the exception of Significance Category 4 occurrences, if there is any significant and new information about the occurrence. The status of occurrence inquiries, recurring consequences, and the identification of additional component defects must be included in the update.	Necessary to support ORPS process.	Changed the section referenced.	Changed		Attach ment 4 – 5.b.
75.	1.5.d	Using a graded approach as described in the Occurrence Reporting Model (see Section 11, DOE M 231.1-2), the contractor should consult in a timely manner with the Facility Representative and the Program Manager, as appropriate, for their assessment, if any, of the occurrence.	Deleted		Redundant with job expectations	Deleted.		
76.	1.6	Occurrence Report Closure. The following steps describe an acceptable process for closing out the Final Report for all occurrences except those categorized as Significance Category 4:	<u>Report Closure.</u>	Necessary to support ORPS process.	Preliminary paragraph was deleted.	Changed and moved.		Attach ment 4 – 7.
77.	1.6.a	The Final Report must be prepared by the contractor and submitted as soon as practical but within 45 calendar days after initial categorization of the	<u>Final Reports</u> The Final Report must be prepared and submitted as soon as practical. The Final	Necessary to support ORPS process.	Minor word changes.	Changed and moved.		Attach ment 4 – 6.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		occurrence. The Final Report must be prepared using the writing instructions listed in Section 1.4.1 and must document the following:	Report or an Update Report to extend the Final Report submission, as discussed in 5.c, must be submitted within 45 calendar days after initial categorization of the occurrence. The Final Report must be prepared using the writing instructions provided in Occurrence Report Preparation (Attachment 3).					
78.	1.6.a(1)	The significance, nature, and extent of the event or condition;	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attachments 3 and 4.	
79.	1.6.a(2)	The causes of the event or condition (including the root cause, as required), using the codes provided in the Causal Analysis Tree (see Section 11, DOE M 231.1-2);	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attachments 3 and 4.	

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
80.	1.6.a(3)	The immediate actions taken and the corrective action(s) to be taken, as required by the Occurrence Reporting Model (see Section 11, DOE M 231.1-2); and	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attachments 3 and 4.	
81.	1.6.a(4)	The lessons learned.	Deleted.	N/A	The requirements are contained in the Occurrence Reporting Model, Attachment 4, of the proposed Order and also in Occurrence Report Preparation (Attachment 3)		Attachments 3 and 4.	
82.	1.6.b	If the required analysis cannot be completed within 45 calendar days after initial categorization, an Update Report must be submitted within the 45 days. The Update Report must provide a detailed explanation of the delay and provide an estimated date for submittal of the Final Report. This information must be reported in the "Evaluation" block of the Occurrence Report. It is expected that the analysis of most occurrences will be completed and the Final Report submitted within the 45 calendar days. However, for certain occurrences, such as those	If the required analysis (see paragraph 8, this attachment) cannot be completed within 45 calendar days after initial categorization, an Update Report must be submitted within the 45 days. The Update Report must provide a detailed explanation of the delay in the "Facility Manager's Evaluation" field of the Occurrence	Necessary to support ORPS process.	Changed to correct and make clearer.	Changed and moved.		Attachment 4 – 5.c and 7.a.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		requiring an accident investigation, it is understood that the information required for the Final Report may not be available within this time. For occurrences resulting in an accident investigation, all causes (direct, contributing, and root) identified in the accident investigation report, as well as the corrective actions developed in response to the judgments of need, must be included in the Final Report.	Report and provide an estimated date for submittal of the Final Report  For occurrences resulting in the appointment of a Federal Accident Investigation Board (see DOE O 225.1B, <i>Accident Investigation</i> ), all causes (direct, contributing, and root) identified in the accident investigation report, as well as the corrective actions developed in response to the judgments of need, must be included in the Final Report.					
83.		New	Within 14 calendar days after receipt of the report, the Facility Representative must review, approve or reject, and add comments, as necessary for Operational Emergencies and Significance Category 1, R, and 2 Final Reports. Local implementing procedures may specify additional approval requirements beyond those stated in this Order.	Necessary to support ORPS process.	Added new text.	Added.		Attach ment 4 – 7.b.
84.		New	Within 14 calendar days after the Facility Representative has approved the Final Report, the Program Manager must review, approve or reject, and add	Necessary to support ORPS process.	Added new text.	Added.		Attach ment 4 – 7.c.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
			comments, as necessary, to any Operational Emergencies and Significance Category 1 Final Reports.					
85.	1.6.c	If the Final Report is not approved by the Facility Representative or the Program Manager as appropriate, then the contractor must submit the revised Final Report within 21 calendar days of the disapproval. If it cannot be resubmitted within this time, an Update Report must be submitted within the 21 calendar days explaining the delay and providing an estimated date for resubmittal of the Final Report. This information must be reported in the "Evaluation" block of the Occurrence Report	If the Final Report is not approved by the applicable Facility Representative or the Program Manager, the Facility Representative or Program Manager must formally reject the report and provide the reason for disapproval in the report's "Facility Representative/Program Manager Comment" field when the action is taken. The revised Final Report must be resubmitted within 21 calendar days of the disapproval. If it cannot be resubmitted within this time, an Update Report must be submitted explaining the delay and providing an estimated date for resubmittal. This information must be reported in the "Facility Manager's Evaluation" field of the Occurrence Report.	Necessary to support ORPS process.	Minor word changes.	Changed and moved.		Attachment 4 – 7.d.
86.	1.6.d	All Occurrence Reports must be distributed as soon as practical to the following: <ul style="list-style-type: none"> <li>- Facility Representative</li> <li>- Program Manager</li> <li>- Heads of all Field organizations (including NNSA)</li> <li>- Office of Environment, Safety and Health (Office of</li> </ul>	Deleted.	N/A	The ORPS program provides the necessary distribution automatically.	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		<p>Performance Assessment and Analysis) and Administrator (NNSA) and</p> <ul style="list-style-type: none"> <li>- DOE Management and Operations or Integrating contractors</li> </ul> <p>If the Occurrence Reports are entered into the ORPS database, the distribution requirement is automatically satisfied</p>						
87.	1.6.e	<p>Depending on the Significance Category, the contractor must track all corrective actions to closure, including independent verification or sampling of corrective actions identified to prevent recurrence, at the facility level and also evaluate the effectiveness of the corrective actions to prevent recurrence (if applicable). Site/contractor corrective action programs will include management of Significance Category 4 occurrences, whose corrective actions are not managed through ORPS.</p>	Deleted.	N/A	<p>This is redundant to other verbiage. O 226.1A and O 414.1C also require corrective action management already.</p>	Deleted.	O 226.1 A and O 414.1 C	
88.	1.6.e	<p>The cognizant contractor may use the ORPS database to track the status of Final Report corrective actions. For those facilities that do not choose to use ORPS to track the status of their corrective actions, the specific corrective action tracking number from the local corrective action tracking system must be entered into ORPS. Any changes made to the corrective actions tracked in the local corrective action system must follow the site's approved change process and should be updated in ORPS. For Significance Category 2 and higher reports, any text change to a corrective action previously entered in ORPS must be updated in ORPS with Facility Representative approval. A status report of all incomplete Occurrence Reports (not Final) and incomplete corrective actions (for those sites who choose to track the status of their corrective</p>	<p>Corrective Action Documentation. Corrective actions status must be tracked in a locally approved tracking system or in the ORPS database. In both cases, the approved corrective actions must be entered into the ORPS database. Facilities that use locally approved systems must document the corrective action tracking number from the local tracking system and the expected corrective action completion date in ORPS. Any expected completion date changes must</p>	<p>Necessary to support ORPS process.</p>	<p>O 226.1A and O 414.1C require corrective action management already. Since contractors are required to have corrective action management systems outside of ORPS, this change in wording allows for minimizing redundancy by allowing use of one or the other.</p>	<p>Changed and moved.</p>	<p>36 CFR Chapter 12, Subchapter B - Records Management.</p>	<p>Attachment 4 – 8.e.</p>

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		actions using ORPS) will be available at any time from the ORPS database.	follow the site's approved change process.		In the interest of increasing contractor accountability, and streamlining requirements to improve efficiencies the contractors should not only be allowed, but expected to use local systems and held accountable for that.			
89.	1.6.e	Any changes made to the corrective actions tracked in the local corrective action system must follow the site's approved change process and should be updated in ORPS. For Significance Category 2 and higher reports, any text change to a corrective action previously entered in ORPS must be updated in ORPS with Facility Representative approval. A status report of all incomplete Occurrence Reports (not Final) and incomplete corrective actions (for those sites who choose to track the status of their corrective actions using ORPS) will be available at any time from the ORPS database.	Deleted.	N/A	Some text was included in Attachment 4 -8.e. The remainder of the text was deleted.	Deleted.		
90.	1.6.f	Retain all supporting information pertaining to each occurrence or report (e.g., graphs, analyses, and formal investigation reports). [See Departmental Records Disposition Schedules, in 36 CFR Chapter 12, Subchapter B, RECORDS MANAGEMENT.]	Deleted.	N/A	This is already a requirement contained in federal law which every contract requires compliance with	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
91.	1.7	<p><u>Short Form Reports.</u> A Short Form Report must be prepared and submitted for all Significance Category 4 occurrences no later than 2 business days after categorization of the occurrence. [Short Form report is described further in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide.</i>] This report will satisfy all of the written reporting requirements for these occurrences.</p>	<p><u>Deleted.</u></p>	<p>N/A</p>	<p>Redundant with description of graded approach and the Occurrence Reporting Model.</p>	<p>Deleted.</p>		
92.	1.8	<p><u>Performance Analyses and Identification of Recurring Occurrences.</u> Each contractor at a site must perform ongoing, but as a minimum quarterly, analyses of events during a 12-month period to look for trends. This periodic performance analysis must evaluate occurrences of all significance categories plus contractor-determined non-reportable events in order to prevent serious events from occurring. Contractors must report quarterly performance analysis results to contractor and DOE line management in order to achieve improvements.</p>	<p><u>Identifying Safety Performance trends and Recurring Occurrences.</u> Periodic trend analysis and reviews to identify potential recurring occurrences must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4).  Ongoing analyses, considering all reportable and non-reportable occurrences and events, must be performed to look for trends and determine if occurrences are recurring. At a minimum, these analyses must be performed quarterly and must consider at least the previous 12-months. The analysis results must be reported to line management. Trending of ORPS data may be conducted as part of integrated analyses within the organization's issue management or</p>	<p>Part of ISM and QA feedback and improvement process function.</p>	<p>Introductory words to reference Attachment 4 that has the requirement.</p>	<p>Changed.</p>		<p>3.f and Attachment 4 - 10.a.</p>

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
			contractor assurance systems.					
93.	1.8	Occurrences identified as recurring must be submitted by the contractor as a new occurrence report for notification of the recurring issue, with investigation, root cause analysis, and corrective actions identified. Previous individual Occurrence Report Numbers associated with the recurring issue must be provided in the Similar Occurrence Report Numbers field. The reporting organization should select the appropriate reporting criteria associated with the recurring issue. If no specific reporting criteria can be identified, the Reporting Criteria should be listed as Group 10, Criteria #2.	Deleted.	N/A	Text was too descriptive on how to do it.	Deleted.		
94.	1.8	Recurring occurrences must be categorized and reported collectively as a Significance Category R occurrence, even if each individual occurrence had been originally categorized at a higher or lower significance level (e.g., as Significance Category 1 or 4 or even as nonreportable occurrences). [See Occurrence Reporting Model, Section 11 of DOE M 231.1-2, requirements for a Significance Category “R” occurrence. More information on the performance analysis requirements for all occurrence reports and specifics on recurring occurrences are provided in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> .]	Recurring occurrences and events must be categorized and reported collectively as a Significance Category R occurrence no matter what the previous individual categorizations were, even if they were previously non-reportable. Previous individual Occurrence Report Numbers associated with the recurring issue must be provided in the “Similar Occurrence Report Number” field. Significance Category R reports must include the results of subsequent analyses and corrective actions, as	Necessary to support ORPS process.	Some changes were made and the reference to the Guide was removed.	Changed and moved.		Attachment 4 – 10.b.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
			described in paragraph 8 of this attachment.					
95.	1.9	Training. Appropriate training programs for the requirements of this CRD must be established for contractor personnel. These training programs must include the following:	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
96.	1.9.a	Indoctrination in the objectives and process of occurrence reporting as defined in the occurrence reporting requirements documents.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
					people are properly prepared to meet the expectations set forth in the requirements.			
97.	1.9.b	Identification of reportable occurrences and their categorization, notification, and associated reporting requirements; analysis, determination, and coding of causes; identification of generic implications; and management of corrective actions.	Deleted.	N/A	This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
98.	1.9.c	Utilization of ORPS, including input of occurrence reports and obtaining information from the database.	Deleted		This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
					prepared to meet the expectations set forth in the requirements.			
99.	1.9.d	Utilization of the Causal Analysis Tree (see Section 11, DOE M 231.1-2).	Deleted		This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the expectations set forth in the requirements.	Deleted.		
100.	1.9.e	Where applicable, the preparation of occurrence reports that may include classified information or unclassified controlled information (e.g. OOU or UCNI), including the sanitization of the report for entry into ORPS.	Deleted		This is redundant with the precepts of ISM and O 414.1C. Training, knowledge, and skills are concepts that managers are already required to do to ensure that the responsible people are properly prepared to meet the	Deleted.		

#	M 231. 1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
					expectations set forth in the requirements.			
101.	2.	<u>REPORTING CRITERIA</u>	Moved all reporting criteria to Attachment 2		Moved all reporting criteria to Attachment 2 in order to consolidate requirements that are common to DOE feds and contractors into one location.	Moved.	Attachment 2	
102.	Section 3	<b>INFORMATION SECURITY REQUIREMENTS</b>	<u>SECURITY REQUIREMENTS</u>		Changed section title	Changed.		2
103.	Section 3	Occurrence Reports containing any classified information, Unclassified Controlled Nuclear Information (UCNI), or other controlled information must not be entered into the ORPS database. Contractors must ensure that a review is performed prior to ORPS data entry to preclude contamination of the database with classified, UCNI, official use only, or other controlled information.	<b>Security Requirements</b> - Occurrence Reports containing controlled information must use procedures described in the Occurrence Reporting Model (Attachment 4).  Occurrence Reports containing any classified information, Unclassified Controlled Nuclear Information (UCNI), or other controlled information must not be entered into the ORPS database.	Security requirements.	Slight word change.	Changed.		CRD 2 and Attachment 4 – 1.a.
104.	Section 3	Any ORPS report determined to be classified or controlled by current classification or control guidance must be submitted using the appropriate secure transmission means. However, with the exception of entry into the ORPS database, all other	All reports determined to be classified or controlled by current classification or control guidance must be submitted in hard copy in	Security requirements.	Minor word changes.	Changed.		Attachment 4 – 1.b.

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		reporting requirements identified in this Manual must be met. In addition, an unclassified version of the Occurrence Report that has been sanitized of all controlled information must be submitted to ORPS within the required time frames specified in Section 1.	accordance with established security requirements and using the appropriate secure transmission means. In addition, an unclassified version of the Occurrence Report that has been sanitized of all controlled information must be submitted to ORPS within the time frames specified in this Order. Specific instructions on the reporting of occurrences via hard copy or the electronic database, the Occurrence Reporting and Processing System (ORPS), are available on the Occurrence Reporting and Processing System homepage.					

#	M 231. 1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
105.	Section 3	Implementing procedures should identify the requirements for distribution of reports containing classified or controlled information. In those instances where UCNI data may still be present in the ORPS database, appropriate security procedures related to the handling of such data need to be followed.	Deleted.	N/A	Security procedures cover this.	Deleted.		
106.	Section 3	[Note: Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) will not be entered or referenced in the ORPS database.]	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) must not be entered or referenced in the ORPS database.	Security concerns.	Minor word change.	Changed.		Attachment 4 – 1.c.
107.	Section 4	<b>UTILIZATION OF REPORTABLE OCCURRENCE INFORMATION</b>	<b>Deleted.</b>	N/A	Redundant.	Deleted.		
108.	4.1	Operational Database. Occurrence Report documentation and distribution requirements will be satisfied by utilization of the Occurrence Reporting and Processing System (ORPS), with the exception of those involving classified information or UCNI. Reports for occurrences involving classified information or UCNI will be prepared in written form. After the classified information and UCNI is removed, the report must	Deleted.	N/A	Removed as it is redundant with CRD 2 and Attachment 4 – 1.	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		be entered into ORPS.						
109.	4.2	<p>Utilization. Each contractor must collect and disseminate to their personnel information from occurrences related to their facilities and similar DOE facilities. This information includes both lessons learned and good practices. Each contractor should use this information for trending and analysis and for early identification and correction of deteriorating conditions. One of the major purposes of this reporting system is to provide feedback of safety and operational information identified in the Occurrence Reports to other DOE facilities. To this end, Occurrence Reports should contain sufficient information about the facility operations and the occurrence to facilitate action by other personnel who are unfamiliar with details of the facility, equipment, process, or procedures. Operations and engineering units, as well as other support organizations, should be involved in the identification and assessment of reportable occurrences. Site information, such as operations logs and engineering evaluations, should be used in this process. Engineering judgment should be used during the review of events and conditions to ensure that precursors to occurrences are identified and reported. An occurrence that is not serious, given the conditions under which it happened, might under different initial conditions be a precursor to a serious event at the same or other facilities.</p>	Deleted.	N/A	Removed. This type of function is covered by ISM, O 210.2, 226.1A, and 414.1C	Deleted.		
110.	<b>SECTION 5.</b>	<b>IMPLEMENTING PROCEDURES.</b> Contractors must develop and maintain implementing procedures for the occurrence reporting and	Deleted.	N/A	Redundant with ISM and 414	Deleted.		

#	M 231.1- 2 CRD Para	Current CRD Requirement	Revised CRD Requirement	Basis for Requirement	Basis for Decision	Comment	Ref	O 232.2 CRD Para
		utilization requirements stated in this CRD within 90-days of the requirements being incorporated into their contracts.						
111.	<b>SECTION 6.</b>	<b>INSTRUCTIONS FOR COMPLETING AN OCCURRENCE REPORT VIA HARD COPY.</b>						
112.		Specific instructions on the reporting of occurrences via hard copy or the electronic database, the Occurrence Reporting and Processing System (ORPS), are listed in DOE G 231.1-1, <i>Occurrence Reporting and Performance Analysis Guide</i> . The documentation and distribution requirements of this CRD will be satisfied by utilization of ORPS. All reports containing classified information or Unclassified Controlled Nuclear Information (UCNI) must be submitted in hard copy in accordance with established security requirements (see Section 3). In addition, an unclassified version of the Occurrence Report that has been sanitized of all controlled information must be submitted to ORPS within the time frames specified in Section 1.	Occurrence reports involving incidents of counterintelligence concern (e.g., foreign persons, governments, organizations, entities or influence) must not be entered or referenced in the ORPS database.	Security concerns.	Reduced the requirement. The Guide no longer exists.	Changed and moved.		Attachment 4 – 1.c.