



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



**DOE Order 232.2 – Occurrence Reporting and Processing of Operations Information (08/30/2011)**  
**Site Compliance Plan (final rev. 07/12/2016)**

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**Introduction**

This Site Compliance Plan (SCP):

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

Impact on the Contract:

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

**Contractor Requirements Document (CRD) – Attachment 1**

CRD §	Requirements from CRD, Attachment 1	Compliance Status	Method of Compliance	Deliverables* (managed through SLACTrak)			
				Item	Frequency	Due Date(s)	Recipient (e.g. SSO)
<b>1.</b>	<b>GENERAL REQUIREMENTS</b>						
<b>1.a.</b>	For reportable occurrences, contractors must categorize the occurrences, notify DOE as required, and prepare and submit Occurrence Reports. <i>[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</i>	In compliance	Occurrences are called in to x5555 where Security provides emergency response as needed and notifies the on-call Facility Manager Designee (FMD). The FMD initially categorizes occurrences and ensures that appropriate notifications are made in accordance with the timelines shown in the Occurrence Reporting Model Chart below. The SLAC Contractor Assurance and Contract Management Office (CACM) concurs on all final categorizations.	n/a	n/a	n/a	n/a

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



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	<i>contractor must ensure that Occurrence Reports are submitted properly for activities within its scope of work.] SLAC has one Facility Management Contractor.</i>		Reports are then submitted to the DOE Occurrence Reporting and Processing System (ORPS) database by CACM as described in this Site Compliance Plan (SCP).  The SLAC Issues Management Program (IMP) and accompanying Incident Report and Investigation Process documents describe the process.				
<b>1.b.</b>	The documentation and distribution requirements must be satisfied by using DOE’s centralized unclassified operational database, the computerized Occurrence Reporting and Processing System (ORPS).	In compliance with approved changes.	SLAC will enter significance category (SC) 3, 4, and R events/conditions into ORPS unless it is mutually determined by SLAC and SSO there are no unique lessons learned opportunities that would benefit the DOE complex. In addition, all SC 3 and 4 injuries, illnesses, or exposures that constitute a violation of 10 CFR 851 will be submitted into ORPS. SLAC manages all abnormal events and conditions through the SLAC CAS, most notably through the IMP and accompanying Incident Report and Investigation Process documents.	n/a	n/a	n/a	n/a
<b>1.c.</b>	Local implementing procedures may specify additional learning and reporting requirements beyond those stated in this CRD, but must at a minimum include all requirements of this CRD.	In compliance with approved changes.	The SLAC IMP and accompanying Incident Report and Investigation Process documents contain the implementing procedures for incident reporting and investigation.  <i>See section 1.b</i>	n/a	n/a	n/a	n/a
<b>2.</b>	<b>SECURITY REQUIREMENTS</b>						
	Occurrence Reports containing controlled information must use procedures described in the Occurrence Reporting Model (Attachment 4).	Not Applicable. SLAC does not have any classified information, Unclassified Controlled Nuclear Information (UCNI), or other controlled information.					
<b>3.</b>	<b>SPECIFIC REQUIREMENTS</b>						
<b>3.a.</b>	Event or Condition Identification and Response. 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 O 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).	In compliance.  NOTE: Order 422.1 not applicable to SLAC per SSO determination.	When an incident is reported to x5555, SLAC Security provides initial response, including emergency response, as necessary. FMD is notified by Security, and will then also participate in coordinating response and providing required notifications. Stabilization of operations is first priority of both Security and FMD, with reporting requirements occurring until after the situation has been stabilized.	n/a	n/a	n/a	n/a

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	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.		The SLAC IMP and accompanying Incident Report and Investigation documents and ESH Manual 37, Emergency Management, describe the process.				
3.b.	Event or Condition Categorization. Events and conditions must be categorized in accordance with the Occurrence Reporting Criteria (Attachment 2) and within the timeframes specified in the Occurrence Reporting Model (Attachment 4), or as soon thereafter as reasonably possible.	In compliance  Note that two Occurrence Reporting Criteria groups (described in Attachment 2 of DOE O 232.2) are not applicable to SLAC: 1) Group 3 – Nuclear Safety Basis; 2) Group 7 – Nuclear Explosive Safety.	The on-call FMD is notified by Security of any incidents reported to x5555, and the FMD immediately initially categorizes the incident based on the information available at the time. The FMD notifies SLAC management of any incidents categorized as meeting ORPS reporting criteria, and SLAC management notifies the SSO Duty Officer. As additional information becomes available, categorization is reconsidered. CACM concurs on all final categorizations.  SLAC management notifies SSO of events and initial ORPS categorization (note that SLAC does not have any Facility Representatives, therefore substitute FR for SSO throughout this SCP). If SLAC management cannot be reached by FMD within approximately 20 minutes of categorization, FMD provides notification of ORPS categorization to SSO Duty Officer. For serious incidents (generally SC OE and 1), SLAC targets producing a written internal status report within two hours of categorization. For non-serious incidents (generally SC 2, 3, 4), SLAC targets producing verbal/written notification within two business days of categorization.	n/a	n/a	n/a	n/a
3.c.	Prompt Notifications. Prompt Notifications, as determined by the Occurrence Reporting Criteria (Attachment 2), must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4).	In compliance	When the on-call FMD categorizes an incident, the FMD also determines if Prompt Notification is required. If so, the FMD ensures that Prompt Notification is made as outlined in Attachment 4. (For Operational Emergencies, 30 minutes from categorization. For all other significance categories, the goal is within 2 hours of categorization.)	n/a	n/a	n/a	n/a

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3.d.	Occurrence Report Processing. Occurrence reports must be processed in accordance with the expectations outlined in the Occurrence Report Preparation (Attachment 3) and Occurrence Reporting Model (Attachment 4).	In compliance with approved changes.	<p>Once the FMD determines that an incident meets ORPS reporting criteria, CACM ensures that appropriate reporting to the ORPS database occurs as described in this SCP and that SSO is notified in a timely manner, with the goal of consistently meeting the ORPS Model timelines shown below.</p> <p><i>See section 1.b</i></p> <p>For submittal of final ORPS reports, the goal is to consistently meet the ORPS Model timelines shown below.</p> <p>Per agreement with SSO, Facility Representative and Program Manager approval of final SC OE, 1, 2, and R reports is not required for SLAC. For SC OE and SC 1 final reports, SLAC Senior Management provides final report approval. SSO concurs with submittal of the final report to ORPS and the report is closed in the ORPS database. For SC 2 final reports, CACM, in necessary coordination with SLAC Senior Management, provides final report approval. SSO concurs with submittal of the final SC 2 report to ORPS and the report is closed in the ORPS database. The basis for this agreement is that SLAC manages all abnormal events and conditions through the SLAC CAS, most notably through the IMP and accompanying Incident Report and Investigation Process documents.</p>	n/a	n/a	n/a	n/a

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3.e.	Occurrence Investigation and Analysis. 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).	In compliance with approved changes.	Once the FMD determines that an incident meets ORPS reporting criteria, the event is managed via the IMP and accompanying Incident Report and Investigation process and ORPS reports are entered into the ORPS database as described in this SCP. CACM ensures that line management investigates and analyzes the incident using the appropriate level of causal analysis as described in the ORPS Model below. SLAC uses the causes listed in the Causal Analysis Tree (Attachment 5) for submitting final reports to ORPS database.  <i>See section 1.b</i>	n/a	n/a	n/a	n/a
3.f.	Identifying Safety Performance Trends and Recurring Occurrences. Periodic trend analysis and reviews to identify potential recurring occurrences must be accomplished in accordance with the Occurrence Reporting Model (Attachment 4).	In compliance with approved changes.	CACM develops trend analysis data, communicates trending information to line management, and makes the data available to SSO. CACM also helps facilitate line management development of trend analysis data, which is also available to SSO. The SLAC Quality Assurance Plan and IMP describe trending and analysis at SLAC.  <i>See section 1.b</i>	n/a	n/a	n/a	n/a
4.	DEFINITIONS. Attachment 6 of Order (no deliverables)						

(end CRD)

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**Occurrence Reporting Model Chart (from Attachment 4)**

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

Significance Category	Timelines*	Prompt/Notification	Final Report Approval	Causal Analysis
Operational Emergencies (defined by DOE O 151.1C)	Categorize: ASAP+ Prompt Notification: 30 min (15 min if further classified) Written Notification: COB next business day not to exceed 90 hrs Final Report: 45 calendar days	To SSO and DOE Headquarters Operations (HQ) Center <i>Section 3.b</i>	By SLAC Senior Management with SSO concurrence <i>Section 3.d</i>	Root Cause or Locally Approved Procedure
Significance Category 1	Categorize: 2 hrs Prompt Notification: 2 hrs Written Notification: COB next business day not to exceed 90 hrs Final Report: 45 calendar days	To SSO and DOE HQ Center <i>Section 3.b</i>	By SLAC Senior Management with SSO concurrence <i>Section 3.d</i>	Root Cause or Locally Approved Procedure
Significance Category R	Categorize: Time of SC R determination As applicable, <i>Section 1.b</i>	---	By CACM, as applicable, with concurrence from SLAC Senior Management and SSO <i>Section 1.b</i> <i>Section 3.d</i>	Root Cause or Locally Approved Procedure
Significance Category 2	Categorize: 2 hrs Prompt Notification: 2 hrs Written Notification: COB next business day Final Report: 45 calendar days	To SSO (When required, DOE HQ Center)† <i>Section 3.b</i>	By CACM, with concurrence from SLAC Senior Management and SSO <i>Section 3.d</i>	Apparent Cause or Locally Approved Procedure
Significance Category 3	Categorize: 2 hrs Prompt Notification: 2 hrs As applicable, <i>Section 1.b</i>	To SSO (When required, DOE HQ Center)† <i>Section 3.b</i>	By CACM, as applicable <i>Section 1.b</i>	Apparent Cause or Locally Approved Procedure
Significance Category 4	Categorize: 2 hrs As applicable, <i>Section 1.b</i>	To SSO and DOE HQ Center† <i>Section 3.b</i>	By CACM, as applicable <i>Section 1.b</i>	Locally Approved Procedure

+ Categorization and Prompt Notification requirements are in accordance with DOE O 151.1C, Emergency Management

\* Categorization Time is from Discovery Date and Time. Prompt Notification is from Categorization Date and Time. Written Notification is from Categorization Date and Time.

† Specific Significance Category 2, 3, and 4 occurrences (identified with an asterisk in Attachment 2, Reporting Criteria) also require Prompt Notification to the DOE HQ E



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**Approvals**

<b>Name:</b>	<b>Title:</b>	<b>Signature:</b>	<b>Date:</b>
Marc E. Clay	Director, Contractor Assurance and Contract Management, SLAC	(on file)	
Tom Rizzi	ES&H & Facilities Lead, SSO	(on file)	

**Please return signed document to: Contract Management, MS 75**