



Responses to Frequently Asked Questions on DOE O 232.2,
Occurrence Reporting and Processing of Operations Information



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INTRODUCTION

The intent of these responses to frequently asked questions (FAQ) is to provide additional insights for Department of Energy (DOE) facility personnel consideration and judgment when categorizing reportable occurrences in accordance with the Occurrence Reporting Criteria contained in DOE Order (O) 232.2, *Occurrence Reporting and Processing of Operations Information*. The frequently asked questions were obtained from DOE line program and contractor representatives through the Energy Facility Contractors Group's (EFCOG) Occurrence Reporting and Processing System (ORPS) Task Group. These questions were sent directly to the Office of Analysis (HS-24), from February to October 2012. Responses were developed, reviewed, and finalized by the Office of Analysis through coordination and consultation with appropriate Subject Matter Experts (SMEs) within the Office of Health, Safety and Security (HSS) and the ORPS Task Group.

For additional information or for assistance with occurrence reporting and to access the ORPS database, contact Ashley Ruocco (301-903-7010; Ashley.Ruocco@hq.doe.gov). Contact Stephen Domotor, Director (301-903-1018; Stephen.Domotor@hq.doe.gov), for additional information on Office of Analysis safety performance analysis, trending, and assistance initiatives.



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Occurrence Reporting Criteria Group 1: **OPERATIONAL EMERGENCIES**

No Frequently Asked Questions



2 Occurrence Reporting Criteria Group 2: PERSONNEL SAFETY AND HEALTH

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat*	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
2A: Occupational Injuries	2A(5)	Any single occurrence resulting in a serious occupational injury. A serious occupational injury is an occupational injury that: <ul style="list-style-type: none"> a) Requires in-patient hospitalization for more than 48 hours, commencing within 7 days from the date the injury was received; b) Results in a fracture of any bone (except bone chips, simple fractures of fingers, toes, or nose, or a minor chipped tooth); c) Causes severe hemorrhages or severe damage to nerves, muscles, tendons, or ligaments <i>[Note: Severe damage is generally considered to have occurred if surgery is required to correct the damage.];</i> d) Damages any internal organ; e) Causes (1) a concussion or (2) loss of consciousness due to an impact to the head; or f) Causes second- or third-degree burns, affecting more than five percent of the body surface. 	3	Lawrence Livermore National Laboratory, EFCOG's ORPS Task Group	If the first diagnosis was not ORPS reportable, but after so many months the final diagnosis is reportable, do I report?	Specific to (b), (c), (d), and (e): The intent of this reporting criterion is to report injuries based on the initial or first-line diagnosis and treatment. Events reported in this category are those for which the diagnosis was obtained within 21 calendar days after the event occurred. This time frame was agreed upon by HSS and the ORPS Task Group in order to receive timely and meaningful ORPS reports. If changes occur from the initial diagnosis, resulting in revised treatment plans (i.e., misinterpretation of test results, additional evaluations performed), then reporting may need to be re-evaluated based on corrected diagnosis.
				EFCOG's ORPS Task Group	Do I report ergonomic injuries under this reporting criterion?	Ergonomic (chronic) conditions (i.e., carpal tunnel syndrome) are not reportable under this criterion, unless in-patient hospitalization for more than 48 hours is required.
				EFCOG's ORPS Task Group	Are the only events to be reported under this criterion injuries that occur under planned work evolutions? This excludes routine activities such as walking or entering/exiting automobiles, which are reported into CAIRS.	Reporting under this criterion should not be limited to cases that occur under planned work evolutions. DOE O 232.2 does not exclude injuries that result outside of a planned work evolution. The activity in progress at the time of the injury is not a factor evaluated to determine if the case is reportable.

* Significance Category

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GROUP 2: PERSONNEL SAFETY AND HEALTH

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2A: Occupational Injuries	2A(5)					Reporting only those injuries that occur under planned work results in the following concerns: <ul style="list-style-type: none"> – Personnel have been injured when performing tasks that were not planned work evolutions. – Data/trending on slips, trips, and falls are needed through ORPS reporting.
2B: Occupational Exposure	2B(3)	Personnel exposure to chemical, biological or physical hazards that exceeds 10 times the limits established in 10 Code of Federal Regulation (CFR) Part 851, <i>Worker Safety and Health Program</i> (see 10 CFR Section 851.23 <i>Safety and Health Standards</i>) or exceeds levels deemed Immediately Dangerous to Life or Health (IDLH).	2	EFCOG's ORPS Task Group	What exposure limits should I report under?	Reporting under this criterion should be based on exposure limits established in 10 CFR Part 851.23 and the safety and health standards referenced in 10 CFR 850.23, as followed in the contractors Worker Safety and Health Program (WSHP) and required by their contract.
				EFCOG's ORPS Task Group	Do I apply the IDLH values to all exposures or to only work activities that reference IDLH values in 10 CFR 851.23?	The IDLH values apply to all exposures. The contractor is expected to consult and adhere to all sources for occupational exposure limits, including, but not limited to, 10 CFR 851.23 regulations/standards, Occupational Safety and Health Administration (OSHA) regulations, National Institute for Occupational Safety and Health (NIOSH) guidelines, manufacturer-established limits, evolving professional practice, and/or the recommendations of other competent authorities. Safety and health professions should take into account all hazard information relating to IDLH.



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2B: Occupational Exposure	2B(4)	Personnel exposure to chemical, biological, or physical hazards (e.g. noise, laser, ultraviolet light, heat, etc.) above limits established in 10 CFR Part 851, <i>Worker Safety and Health Program</i> (see 10 CFR Section 851.23, <i>Safety and Health Standards</i>), but below levels deemed IDLH, and requires the administration of medical treatment beyond first aid on the same day as the exposure.	3	EFCOG's ORPS Task Group	What exposure limits should I report under?	Reporting under this criterion should be based on exposure limits established in 10 CFR Part 851.23 and the safety and health standards referenced in 10 CFR 850.23, as follows in the contractor's Worker Safety and Health Program (WSHP) and required by their contract.
	2B(5)	Any exposure including chronic resulting in a serious occupational injury. A serious occupational injury is an occupational injury that <ul style="list-style-type: none"> - Requires in-patient hospitalization for more than 48 hours, commencing within 7 days from the date the exposure was received; - Damages any internal organ; - Leads to diagnosis of a debilitating disease; or - Causes second-or third-degree burns, affecting more than five percent of the body surface. 	3	EFCOG's ORPS Task Group	Do I report a retired employee's injury that is related to chronic exposure?	Reporting under this criterion should be based on exposure limits established in 10 CFR Part 851.23 and the safety and health standards referenced in 10 CFR 850.23, as follows in the contractor's Worker Safety and Health Program (WSHP) and required by their contract.
				EFCOG's ORPS Task Group	Is chronic noise exposure reportable under this criterion?	Under this criterion, if an exposure is OSHA reportable, then it is ORPS reportable. For example, an exposure resulting in a hearing ability reduction would be considered reportable under this criterion.



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2B: Occupational Exposure	2B(6)	Personnel exposure to chemical, biological or physical hazards (e.g. noise, laser, ultraviolet light, heat, etc.) above limits established in 10 CFR Part 851, but below levels deemed IDLH.	4	EFCOG's ORPS Task Group	What exposure limits should I report under?	Reporting under this criterion should be based on exposure limits established in 10 CFR Part 851.23, as committed to in the contractor's WSHP and required by their contract.
2C: Fires	2C(1)	Any fire emergency or fire incident within primary confinement/containment boundaries of a nuclear facility, except a fire that self-extinguishes in 10 minutes or less. [Note: Facility-specific documents need to define what constitutes the primary confinement/containment boundary.]	1	EFCOG's ORPS Task Group	What is the definition of a fire emergency?	For the purposes of reporting under this criterion, the following definitions apply. <ul style="list-style-type: none"> – <i>Fire</i> (from DOE-STD-1066-2012): Unplanned destructive and uncontrolled burning, including detonation and deflagration, as manifested by any or all of the following: flame; heat; or smoke. Fire does not include the following unless they cause a fire or occur as a consequence of a fire: lightning or electrical discharge; rupture of a pressure vessel not caused by internal combustion; detonation of munitions; or overheating (without damage to initiating material). – A <i>Fire Emergency</i> is defined as any event where workers either manually activate automatic fire suppression systems or utilize portable fire extinguishers to control or suppress a fire. Additionally, a fire emergency is considered in effect when either the on-site fire department or brigade is summoned in response to fire in the area.



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2C: Fires	2C(1)			EFCOG's ORPS Task Group	What is the definition of a fire incident?	<p>For the purposes of reporting under this criterion, the following definitions apply.</p> <ul style="list-style-type: none"> - A <i>Fire Incident</i> is defined as any fire within primary confinement/containment boundaries of a nuclear facility, regardless of the exact materials, equipment, or structure that is involved. - <i>Anticipated Fire Activity</i>: Any activity that has the potential to produce visible flame or smoke which is expected, clearly defined in nature, scope, and size; and, where specific plans or procedures are in-place with appropriately trained personnel. One example of an anticipated fire activity might be a drum fire in a waste remediation project where the event is anticipated and control is planned through processes documented in the DSA and associated operating procedures. Such anticipated fire activity is not ORPS reportable. However, any fire that develops under a hot work permitting process that becomes extinguished by the fire watch or others should be reported into ORPS, as this type of fire incident is not fully anticipated.

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2C: Fires	2C(1)			EFCOG's ORPS Task Group	Are anticipated fires reportable in ORPS?	Final determinations as to whether a fire actually occurred, activation status of suppression systems, and how the fire-related aspects of the event should be described should be made in consultation with contractor fire protection/emergency management Subject Matter Experts (SME). Anticipated fires are not ORPS reportable.
	2C(2)	Any fire emergency or fire incident in a nuclear facility that: <ul style="list-style-type: none"> – Activates a fixed automatic fire suppression system (clean agent or wet-pipe automatic sprinkler protection); or – Is extinguished manually by the emergency response organization; or – Disrupts normal operations in the facility; or – Is a fire within primary confinement/containment that self-extinguishes in 10 minutes or less. <p><i>[Note: The activation or degradation of Safety Class and Safety Significant fire suppression systems are addressed by Group 4 Criteria.]</i></p>	2	EFCOG's ORPS Task Group	What does it mean to “disrupt normal operations”? How long must normal operations be disrupted to be reportable?	A disruption of normal operations is considered to have occurred when alarms, emergency response, evacuation, or shelter in place results in a suspension of an activity or activities for any length of time. <i>Note: These are “or” statements; meeting any ONE of the criteria results in a reportable event.</i>



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2C: Fires	2C(3)	Any fire emergency or fire incident in a non-nuclear facility that: <ul style="list-style-type: none"> – Activates a fixed automatic fire suppression system, or – Takes longer than 10 minutes to extinguish following the arrival of the emergency response organization, or – Disrupts normal operations in the facility for more than eight hours. 	3	EFCOG's ORPS Task Group	Does this criterion include administrative buildings, warehouses, etc?	Any fire emergency or fire incident that meets a), b), or c) at a DOE non-nuclear facility is reportable under this criterion. This includes DOE-owned or -operated administrative buildings, warehouses, etc.
	2C(4)	Any fire in a nuclear facility.	4	EFCOG's ORPS Task Group	Are anticipated fires reportable in ORPS?	Anticipated fires (as defined below) are not ORPS reportable. <ul style="list-style-type: none"> – <i>Anticipated Fire Activity:</i> Any activity that has the potential to produce visible flame or smoke which is expected, clearly defined in nature, scope, and size; and, where specific plans or procedures are in-place with appropriately trained personnel. One example of an anticipated fire activity might be a drum fire in a waste remediation project where the event is anticipated and control is planned through processes documented in the DSA and associated operating procedures. Such anticipated fire activity is not ORPS reportable. However, any fire that develops under a hot work permitting process that becomes extinguished by the fire watch or others should be reported into ORPS as this type of fire incident is not fully anticipated.

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2C: Fires	2C(4)					Final determinations as to whether a fire actually occurred, activation status of suppression systems, and how the fire-related aspects of the event should be described should be made in consultation with contractor fire protection/emergency management SMEs.
	2C(5)	Any wild land fire (e.g., forest fire, grassland fire) or other fire outside of a DOE facility that has the potential to threaten the facility.	4	EFCOG's ORPS Task Group	How do I determine if a fire outside of a DOE facility has the potential to threaten the facility?	Determination is made when contractor emergency response personnel have responded, established incident command, and determined that a wildland fire or other fire outside of a DOE facility has the potential to threaten a DOE facility.
2D: Explosions	2D(1)	Any unplanned explosion within primary confinement/containment boundaries of a nuclear facility. <i>[Note: Facility-specific documents need to define what constitutes the primary confinement/containment boundary.]</i>	1	EFCOG's ORPS Task Group	What is the definition of an explosion?	<p>For the purposes of reporting under this criterion, the following definitions apply.</p> <ul style="list-style-type: none"> – <i>Explosion</i>: A sudden, rapid release of energy that produces potentially damaging pressures. . – <i>Deflagration</i>: A flame propagation at sub-sonic speed away from the ignition site. – <i>Detonation</i>: An explosion in which the flame propagates at supersonic speeds through the unburned fuel. (Chapter 8 of the NFPA Fire Protection Handbook, Nineteenth Edition) <p>Explosions can result from ignition events involving energetic materials, a pressurization event, or a chemical reaction.</p>



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2D: Explosions	2D(2)	Any unplanned explosion in a nuclear facility that disrupts normal operations in the facility.	2	EFCOG's ORPS Task Group	What does it mean to "disrupt normal operations"? How long must normal operations be disrupted to be reportable?	A disruption of normal operations considered to have occurred when alarms, emergency response, evacuation, or shelter in place results in suspension of an activity or activities for any length of time. <i>[Same as 2D(3)]</i>
	2D(3)	Any unplanned explosion in a non-nuclear facility that disrupts normal operations in the facility.	3	EFCOG's ORPS Task Group	What does it mean to "disrupt normal operations"? How long must normal operations be disrupted to be reportable?	A disruption of normal operations considered to have occurred when alarms, emergency response, evacuation, or shelter in place results in suspension of an activity or activities for any length of time. <i>[Same as 2D(2)]</i>
2E: Hazardous Electrical Energy Control	2E(1)	Any unexpected or unintended personal contact (burn, injury, etc.) with an electrical hazardous energy source (e.g., live electrical power circuit, etc.).	2	EFCOG's ORPS Task Group	Is this reporting criterion only applicable under a work control process?	Any personal contact with a hazardous electrical energy source that results in a shock, burn, or other injury. This includes intrusions with tools or equipment that present a conductive (suitable for carrying electrical current) path back to the person that again results in a shock, burn, or other injury. This reporting criterion is applicable regardless whether it is under a work control process or not.
				EFCOG's ORPS Task Group	What is the definition of a hazardous energy source?	A hazardous electrical energy source is one that would require hazardous energy control as discussed in NFPA 70E (or latest version), specifically Article 130, or a source that exceeds the thresholds for a shock (Table 1), arc flash (Table 4), or thermal hazard (Table 5) established in the EFCOG/DOE Electrical Safety Measurement Tool, Rev. 2, dated

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2E: Hazardous Electrical Energy Control	2E(1)			EFCOG's ORPS Task Group	Is it required to provide the Electrical Severity Measurement Score in an ORPS report? If so, what section of the ORPS report does the score go into?	<p>October 20, 2010, which is also Appendix F of the DOE <i>Electrical Safety Handbook</i>. This is reiterated in EFCOG Best Practice #120, Item #3. (This is a reference to the voltage/current tables, not use of the tool).</p> <p>[Note: The Electrical Severity Measurement Tool can be accessed at: http://www.efcoq.org/bp/p/doc/bp48-Electrical_Severity_Measurement_Tool%20R3.pdf]</p>
					What events are reportable under this criterion? Does an energy source that is absent based on automatic control set-points considered live?	It is not required by DOE O 232.2 to include the Electrical Severity Measurement Score in an ORPS Report. If you chose to include this information in the ORPS Report, it is recommended that you include the score in the Occurrence Description section of the ORPS report.
	2E(2)	Any unexpected discovery of an uncontrolled electrical hazardous energy source (e.g., live electrical power circuit, etc.). This criterion does not include discoveries made by zero-energy checks and other precautionary investigations made before work is authorized to begin.	3	EFCOG's ORPS Task Group	What events are reportable under this criterion? Does an energy source that is absent based on automatic control set-points considered live?	Events reportable under this criterion are limited to the discovery of live electrical power circuits or circuit parts that exceed NFPA 70E (or latest revision). The thresholds for a shock, arc flash, or thermal hazard are established in the EFCOG/DOE Electrical Safety Measurement Tool, Rev. 2, dated October 20, 2010, which is reiterated in EFCOG Best Practice 120, Item 3. Energy sources that are absent only based on automatic control set-points are considered live.



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2E: Hazardous Electrical Energy Control	2E(2)			EFCOG's ORPS Task Group	Does reporting under this criterion only apply when performing work (servicing or performing maintenance) on equipment as per the definition of a Hazardous Energy Control Program in 29 CFR 1910.147, <i>Occupational Safety and Health Standards—The control of hazardous energy (lockout/tagout)</i> ?	Reporting under this criterion includes any event that involves an uncontrolled electrical hazardous energy source that is unexpected, but not if discovered during zero-energy checks and other precautionary investigations made before work is authorized to begin. Reporting under criterion 2E(2) applies to hazardous electrical energy control events.
	2E(3)	Any failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout, hazardous energy control program).	4	EFCOG's ORPS Task Group	Do I report under this criterion if a person came in contact with a live electrical power circuit?	This criterion is used to categorize a hazardous energy control process/program issue found during any electrical hazardous energy control evolution that did not result in a person coming in contact with, or the discovery of, live electrical power circuits or circuit parts. If a person came in contact with a live electrical power circuit, reporting under criterion 2E(1) is required.
				EFCOG's ORPS Task Group	Does this reporting criterion include administrative errors, like a typo on the lockout/tagout that did not impact the isolation of the hazardous energy?	This criterion includes administrative errors if the error(s) could have resulted in a person coming in contact with electrical energy (lockout/tagout in the wrong location, personnel not listed on log sheets, etc.) or could have resulted in unexpected discovery of uncontrolled hazardous energy. Also consider 10(3) Near Miss reporting. The criterion excludes administrative errors that did not impact the isolation or control of hazardous energy (date, typo, audits, etc.).



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2E: Hazardous Electrical Energy Control	2E(3)			EFCOG's ORPS Task Group	What is a prescribed hazardous energy control process?	Prescribed hazardous energy control process: a 10 CFR 851 source requirement identified in the local approved WSHP (e.g., NFPA 70E and OSHA). It does not include local implementing procedural requirements not tied to a source requirement.
				EFCOG's ORPS Task Group	Does reporting under this criterion only apply when performing work (servicing or performing maintenance) on equipment as per the definition of a Hazardous Energy Control Program in 29 CFR 1910.147?	Reporting under this criterion includes any event that involves a prescribed hazardous energy control process that was not followed.
2F: Hazardous Energy Control (other than electrical)	2F(1)	Any unexpected or unintended personal contact (burn, injury, etc.) with a hazardous energy source (e.g., powered mechanical hazards, steam, pressurized gas).	2	EFCOG's ORPS Task Group	Does this reporting criterion include electrical?	This reporting criterion does not include electrical events. Any personal contact with a hazardous energy source other than electrical that results in a burn, injury, etc. is reportable.
				EFCOG's ORPS Task Group	What is the definition of a hazardous energy source?	The definition of a hazardous energy source (other than electrical) includes any source of mechanical, hydraulic/pneumatic, chemical, thermal, radiation, gravitational, or other energy that that could cause injury due to the unintended motion, energizing, startup, or release of such stored or residual energy in machinery, equipment, piping, or process systems. Hazardous energy control process includes any series of actions conducted in a prescribed order, specifically designed to

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2F: Hazardous Energy Control (other than electrical)	2F(1)					<p>prevent the release of hazardous energy or to prevent the exposure of personnel to hazardous energy. The process may range from a simple tag to a documented multistep procedure.</p> <p>Industrial Hygiene and Safety (IHS) provides SMEs for Subgroup 2F, providing to Facility Management professional guidance regarding:</p> <ul style="list-style-type: none"> - Level of hazard from the involved energy source ; - Site requirements for control of the energy source ; - Adequacy of identification and control of the energy source in work plans; - Compliance with the controls in execution of the work. <p>If the Facility Manager with IHS consult determines that there was neither actual nor potential exposure to hazardous energy in the event, DO NOT report under this Subgroup, but consider reporting under Group 10 as either Management Concern or Near Miss.</p> <p>Minor administrative errors that do not impact safety are not reportable under this Subgroup.</p> <p>If facts needed for a complete analysis of the event are not available at the time of the critique, the Facility Manager should</p>

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2F: Hazardous Energy Control (other than electrical)	2F(1)					<p>categorize conservatively and revise categorization as soon as additional data are available.</p> <p>DOE-STD-1030-96, <i>Guide to Good Practices for Lockouts and Tagouts</i>, defines energy source (both electrical and non-electrical) as well.</p>
	2F(2)	Any unexpected discovery of an uncontrolled hazardous energy source (e.g., powered mechanical hazards, steam, pressurized gas). This criterion does not include discoveries made by zero-energy checks and other precautionary investigations made before work is authorized to begin.	3	EFCOG's ORPS Task Group	What events are reportable under this criterion?	Events reportable under this criterion are limited to the discovery of a live hazardous energy source, such as powered mechanical hazards, steam, pressurized gas, that exceeds the thresholds to be defined.
				EFCOG's ORPS Task Group	Does an energy source that is absent based on automatic control set points considered live?	Energy sources that are absent only based on automatic control set points are considered live.
				EFCOG's ORPS Task Group	Does reporting under this criterion apply only when performing work (servicing or performing maintenance) on equipment as per the definition of a Hazardous Energy Control Program in 29 CFR 1910.147?	Reporting under this criterion includes any event that involves an uncontrolled hazardous energy source that is unexpected, but not if discovered during zero-energy checks and other precautionary investigations made before work is authorized to begin.
2F(3)	Any failure to follow a prescribed hazardous energy control process (e.g., lockout/tagout, hazardous energy control program).	4	EFCOG's ORPS Task Group	Do I report if a worker discovered a live hazardous energy source?	Yes, this would be ORPS reportable under 2F(2). This criterion, 2F(3), is used to categorize a hazardous energy control process/program issue found during any	

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2F: Hazardous Energy Control (other than electrical)	2F(3)			EFCOG's ORPS Task Group	Does this reporting criterion include administrative errors, like a typo on the lockout/tagout that did not impact the isolation of the hazardous energy?	<p>hazardous energy control evolution that did <i>not</i> result in a person coming in contact with, or the discovery of, a live hazardous energy source. All applicable reporting criteria must be included in the ORPS reports.</p> <p>Includes administrative errors if the error(s) could have resulted in a person coming in contact with hazardous energy (lockout/tagout in wrong location, personnel not listed on log sheets, etc.) or could have resulted in unexpected discovery of uncontrolled hazardous energy. Also consider 10(3), Near Miss reporting.</p> <p>Excludes administrative errors that did not impact the isolation or control of hazardous energy (date, typo, audits, etc.).</p>
				EFCOG's ORPS Task Group	Does reporting under this criterion only apply when performing work (servicing or performing maintenance) on equipment as per the definition of a Hazardous Energy Control Program in 29 CFR 1910.147?	Reporting under this criterion includes any event that involves a prescribed hazardous energy control process that was not followed.



3 Occurrence Reporting Criteria Group 3: NUCLEAR SAFETY BASIS

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
3B: Documented Safety Analysis Inadequacies	3B(3)	Determination of a negative Unreviewed Safety Question (USQ).	4	EFCOG's ORPS Task Group	Is this applicable only to a negative USQ that is determined following a Potential Inadequacy of the Documented Safety Analysis (PISA)?	This criterion is applicable to negative USQs determined following the declaration of a PISA — Group 3B(2).



Occurrence Reporting Criteria Group 4: SAFETY STRUCTURE/**4**/SYSTEM/COMPONENT DEGRADATION (NUCLEAR FACILITIES)

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
4A: Safety Structure/ System/ Component Degradation (Nuclear Facilities)	4A(1)	Performance degradation of any Safety Class (SC) or Safety Significant (SS) Structure, System, or Component (SSC), or any support system that is required for safety operation of the SC or SS, SSCs, which prevents satisfactory performance of its design function when it is required to be operable <i>[Note: Performance degradation includes the absence of or deficiency with Design Features for which credit has been taken in the Documented Safety Analysis].</i>	3	EFCOG's ORPS Task Group	What is the definition of a support system?	Support systems are identified in the DSAs and defined in DOE G 420.1-1, <i>Nonreactor Nuclear Safety Design Criteria and Explosive Safety Criteria Guide for Use with DOE O 420.1</i> , Facility Safety.
				EFCOG's ORPS Task Group	Who should be consulted for final categorization determination of a performance degradation or design deficiency of an SSC?	The DSA SME should be consulted for final categorization determination.
				EFCOG's ORPS Task Group	If there is a temporary loss, but all actions and completions times are met and there was no compromise to the authorization bases, is this reportable?	Yes. Entering Limiting Condition of Operations (LCO) Statements for a degraded SSC does not change the fact that a degradation of performance exists or that the SSC is unable to satisfy its design function, even during a temporary loss. The LCO allows the facility to operate at its lowest functional capability or performance level of safety. Although the LCO allows a facility to continue to operate for a stated period of time within its Safety Basis, an occurrence report should still be submitted to meet Objectives 1.a and 1.b of DOE O 232.2. This data is helpful in understanding the extent of SC or SS/SSC failures/ degradation across the DOE Complex.



GROUP 4: SAFETY STRUCTURE/SYSTEM/COMPONENT DEGRADATION (NUCLEAR FACILITIES)

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
4A: Safety Structure/ System/ Component Degradation (Nuclear Facilities)	4A(2)	Performance degradation of any Safety Class SSC when not required to be operable. <i>[Note: Performance degradation includes the absence of or deficiency with Design Features for which credit has been taken in the Documented Safety Analysis].</i>	4	EFCOG's ORPS Task Group	If there is a temporary loss but all actions and completions times are met and there was no compromise to the authorization bases, is this reportable?	Yes. Entering Limiting Condition of Operations (LCO) Statements for a degraded SSC does not change the fact that a degradation of performance exists or that the SSC is unable to satisfy its design function, even during a temporary loss. The LCO allows the facility to operate at its lowest functional capability or performance level of safety. Although the LCO allows a facility to continue to operate for a stated period of time within its Safety Basis, an occurrence report should still be submitted to meet Objectives 1.a and 1.b of DOE O 232.2. This data is helpful in understanding the extent of SC or SS/SSC failures/ degradation across the DOE Complex.
4B: Operations	4B(4)	A facility evacuation, other than a precautionary evacuation or an evacuation due to false alarms or spurious alarms (e.g., due to electronic noise, radon/thoron decay). If the event fell under another reporting criterion, then evacuation should be reported as well by noting multiple reporting criteria for the single occurrence.	3	EFCOG's ORPS Task Group	What is the definition of a facility?	Reference definition of "facility" in DOE O 232.2. <i>[Note: Relocation of personnel within a facility where the actual event does not present a hazard constitutes a precautionary relocation (e.g. loss of ventilation, outage of Criticality Accident Alarm System, spurious or false alarms) and therefore would not be ORPS reportable, unless another reporting criterion applies to the event.]</i>
				EFCOG's ORPS Task Group	What is considered a precautionary evacuation?	Precautionary evacuations are discretionary evacuations that are taken in case of a possible event or an unknown condition that could affect worker/public safety and health for which a mandatory evacuation or a shelter in place order might not be

(continued)



GROUP 4: SAFETY STRUCTURE/SYSTEM/COMPONENT DEGRADATION (NUCLEAR FACILITIES)

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions	
4B: Operations	4B(4)			EFCOG's ORPS Task Group	What is included under false or spurious alarms?	<p>necessary. Precautionary evacuations can be localized to a room, area, floor, or building/facility in order to exclude personnel until a safety evaluation has been performed. All evacuations, including those deemed "precautionary," should be evaluated under Reporting Criteria 10 as well (e.g., for public or media attention or management concern regarding some aspect of the evacuation or reentry or due to repeat equipment problems).</p> <p>False/Spurious includes evacuations initiated by sensors or personnel that are determined by the responding emergency personnel to have not resulted from an actual unsafe condition (e.g., no fire or other hazardous atmosphere).</p>	
		4B(7)	Any event or condition that would prevent immediate facility or offsite emergency response capabilities.	4	EFCOG's ORPS Task Group	What are some examples that would fall under this reporting criterion?	This criterion relates to plant conditions or resources that would prevent effective response. Examples are out of service fire truck or ambulance; emergency response teams below required staffing levels.
					EFCOG's ORPS Task Group	Would bad weather or traffic that would slow response time be reportable?	Transient conditions that slow, but do not preclude, emergency response, such as blocked roads or adverse weather conditions are <i>exempt</i> from reporting.



GROUP 4: SAFETY STRUCTURE/SYSTEM/COMPONENT DEGRADATION (NUCLEAR FACILITIES)

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
4C: Suspect/Counterfeit and Defective Items or Material	4C(1)	Discovery of any suspect or counterfeit item or material found in a Safety Class or Safety Significant Structure, System, or Component (SSC).	3	EFCOG's ORPS Task Group	How do I report if I do not have all information on a suspect or counterfeit item or if some information is sensitive?	Reports on suspect/counterfeit and defective items (S/CI) or material must provide the information identified in Attachment 3, when available. In some instances, the information may be considered sensitive (such as contact names and phone numbers). In those instances, the information need not be included in the report but can be obtained by contacting the Originator of the ORPS report.
	4C(2)	Discovery of any other suspect or counterfeit item or material (i.e., not found in a Safety Class or Safety Significant Structure, System, or Component) that is found in any application whose failure could result in a loss of safety function, or present a hazard to public or worker health and safety.	4	Suspect/Counterfeit and Defective Items (S/CI) Focus Group	Does this reporting criterion require reporting only S/CI from a safety class, safety significant system or where the application could hazard workers or the public?	Any S/CI that is installed in any application where failure results in a loss of a safety function is reportable. ORPS Reportable S/CIs are for those S/CIs that have an effect on any safety application.



5 Occurrence Reporting Criteria Group 5: ENVIRONMENTAL

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
5A: Releases	5A(2)	Any release (onsite or offsite) of a pollutant from a DOE facility that is above levels or limits specified by outside agencies in a permit, license, or equivalent authorization, when reporting is required in a format other than routine periodic reports <i>[Note: See Group 1, Criterion 1, for situations under which releases of pollutants into the environment exceeding permit limits would be reported under "Operational Emergencies."]</i>	4	EFCOG's ORPS Task Group	Is a potable water spill that does not result in erosion or any other negative factor reportable in ORPS?	This criterion does not apply to the following: <ul style="list-style-type: none"> a) discharges (including potable water) that do not result in leaching or erosion of contaminated material from a known or suspected boundary of a Potential Release Site (PRS) or b) discharges (including potable water) capable of reaching surface or groundwater that do not require remediation/repair. <i>[Note: The contractor's environmental subject matter experts make the determination of environmental impact and the need for remediation/repair activities.]</i>



Occurrence Reporting Criteria Group 6: **6** CONTAMINATION/RADIATION CONTROL

NO FREQUENTLY ASKED QUESTIONS



Occurrence Reporting Criteria Group **7**: **NUCLEAR EXPLOSIVE SAFETY**

NO FREQUENTLY ASKED QUESTIONS



8 Occurrence Reporting Criteria Group 8: PACKAGING AND TRANSPORTATION

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
8: Packaging and Transportation	8(4)	Any offsite transportation incident involving DOE hazardous materials that requires submission of a Hazardous Materials Incident Report on DOT Form F 5800.1 pursuant to 49 CFR Section 171.16.	3	EFCOG's ORPS Task Group and commonly asked question from across the DOE Complex	If a DOE site receives a shipment from a non-DOE entity and there is an issue as a result of the shipper, is this reportable in ORPS?	For reporting under this criterion, the ORPS report belongs to the party that initiated the shipment (i.e., ORPS report belongs to the shipper of record). When the shipper is not under DOE, there would be no ORPS report under this criterion.



Occurrence Reporting Criteria Group 9: **NONCOMPLIANCE NOTIFICATIONS**

NO FREQUENTLY ASKED QUESTIONS



10 Occurrence Reporting Criteria Group 10: MANAGEMENT CONCERNS/ISSUES

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
10: Management Concerns/ Issues	10(3)	A near miss to an otherwise ORPS reportable event where something physically happened that was unexpected or unintended or where no or only one barrier prevented an event from having a reportable consequence The significance category assigned to the near miss must be based on an evaluation of the potential risks and extent of personnel exposure to the hazard. <i>[Note: Follow the Prompt Notification requirements identified in the Occurrence Reporting Model (Attachment 4).]</i>	1-3	EFCOG's ORPS Task Group	Is a near miss event applicable only to injury or exposure events?	The near miss criterion is applicable to all reporting criteria where something physically happened that was unexpected or unintended or where no or only one barrier prevented an event from having a reportable consequence.



ATTACHMENTS

DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
Attachment 4.9	n/a	Lessons learned must be considered in accordance with DOE O 210.2A, DOE Corporate Operating Experience Program, dated 4-8-11. Any lessons learned developed from the event must be entered in the "Lessons Learned" field	n/a	Commonly asked question from across the DOE Complex	In the Lessons Learned field, do I include the entire Lessons Learned Report that was posted in the Lessons Learned Database?	<p>The Lessons Learned field in an ORPS report should contain lessons learned known at the time of finalizing the ORPS Report. Lessons Learned Reports (in accordance with DOE O 210.2A) should not be duplicated in the Lessons Learned ORPS field. If possible, the Lessons Learned field can include a reference to the Lessons Learned Report Number.</p> <p>Make note in the Corrective Actions field if a Lessons Learned Report will be issued internally or on the HQ Lessons Learned Database and its expected completion date.</p>
Attachment 4.8.d	n/a	Generic implications including the need for extent-of-condition review must be assessed and results documented in the "Description of Cause" field.	n/a	Commonly asked question from across the DOE Complex	Is there guidance on how to perform an extent of condition?	<p>An extent of condition is performed on a case-by-case basis. If an extent of condition review is deemed unnecessary since the event is a single point event that is unique and specific, then the justification for not performing an extent of condition review needs to be explained in the Final Report. If the event has a possibility of occurring again or elsewhere, an extent of condition review must be conducted. Extent of condition reviews are tailored to each event. All extent of condition reviews have the same goal, find out whether the problem exists elsewhere and fix the issue before another event occurs. In ORPS Final Reports, the need for extent of condition must be discussed in the Description of Cause field.</p>



DOE O 232.2 Occurrence Reporting Criteria Group	DOE O 232.2 Reporting Criterion	DOE O 232.2 Categorization Criteria	Sig Cat	Source of the Question	Frequently Asked Questions	Responses to Frequently Asked Questions
Attachment 4.8.d				Commonly asked question from across the DOE Complex	Is there any guidance on when extent of condition reviews are required?	If deemed necessary, an extent of condition should be performed as soon as possible in order to prevent future occurrences.