

**United States Department of Energy**  
**Supporting Statement**  
**Environment, Safety and Health**  
**OMB Control Number 1910-0300**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for processing of the proposed information collection, (*Environment, Safety and Health*). The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, "Instructions for Completing OMB Form 83-I."

**A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

— This package contains information collections that are used by Departmental management to exercise management oversight and control over Management and Operating (M&O) contractors of DOE's Government-Owned Contractor-Operated (GOCO) facilities, and offsite contractors. The contractor management oversight and control function concerns the ways in which DOE contractors provide goods and services for DOE organizations and activities in accordance with the terms of their contract; the applicable statutory, regulatory and mission support requirements of the Department; and regulations in the functional area covered by this package.

The basic authority for these collections is the statute establishing the Department of Energy ("Department of Energy Organization Act," Public Law 95-91, of August 4, 1977) which vests the Secretary of Energy with the executive direction and management functions, authority and responsibilities for the Department, including contract management. Under the provisions of 42 USC 7254 and 42 USC 7256 (a) the Secretary of Energy is authorized to prescribe such procedural and administrative rules including information collections pertaining to management of DOE programs or contracts deemed necessary or appropriate.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information obtained from DOE contractors by this information collection is used by Department management at the appropriate levels to manage the work pertaining to environment, safety and health throughout DOE and will include automated reporting of information into the following systems:

**Computerized Accident/Incident Reporting System (CAIRS)** – The CAIRS is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other

accidents that occur during DOE operations as described in DOE O 231.1B, *Environment, Safety and Health Reporting*, and associated instructions. This system contains information from reporting contractors and subcontractors.

**Occurrence Reporting and Processing System (ORPS)** – The DOE’s Occurrence Reporting System permits timely notification to the DOE complex of events that could adversely affect public or DOE worker health and safety, the environment operations of DOE facilities. The Occurrence Reporting Program, including the ORPS requirements are described in DOE O 232.2 Admin Chg 1, *Occurrence Reporting and Processing of Operations Information*.

**Noncompliance Tracking System** – The Noncompliance Tracking System (NTS) is a web-based system used by DOE contractors to report nuclear and worker safety and health regulatory noncompliances to DOE as described in 10 C.F.R. 820 and 10 C.F.R. 851. Reporting into the system is voluntary, but contractors that self-report noncompliances in accordance with the Department’s expectations may be granted discretion or mitigation of proposed civil penalties for noncompliances that are subject to an enforcement investigation. DOE contractors identify and track to closure corrective actions for the noncompliances in each report. The corrective actions are reviewed by DOE Field Elements and investigators in the Office of Worker Safety and Health Enforcement and the Office of Nuclear Safety Enforcement.

**Radiation Exposure Monitoring System (REMS)** – This is a database of occupational radiation exposures for all monitored DOE employees, contractors, subcontractors and members of the public. The Rule 10 CFR 835 702 (a) and (b) requires Annual Individual Radiation Exposure Records to be recorded, and reported to the Radiation Exposure Monitoring System Repository according to requirements provided in DOE Order 231.1B, *Environment, Safety and Health Reporting* and associated REMS reporting online instructions.

**Annual Fire Protection Summary Application** – This system contains information from reporting contractors and subcontractors for an Annual Fire Protection Program Summary (AFPPS). The AFPPS report is required by section 5a.(8) of DOE Order 231.1B, *Environment, Safety and Health Reporting*. The DOE’s Fire Protection Program is multi-faceted. It includes published fire safety directives (Orders, standards, and guidance documents), a range of oversight activities, an annual fire protection program summary, and a directory of fire safety professionals. DOE also sponsors fire safety conferences, various training initiatives, and a spectrum of technical assistance activities.

**Safety Basis Information System** – Subpart B of 10 CFR Part 830, *Nuclear Safety Management* requires contractors and operators of DOE hazard category 1, 2, and 3 nuclear facilities to develop and maintain a Safety Basis for each facility and to perform work in accordance with that Safety Basis. In Appendix A to Subpart B of 10 CFR Part 830, DOE committed to provide members of the public and with up-to-date information on its nuclear facility Safety Bases. The Safety Basis Information System was created to meet this requirement and also to provide DOE line managers with a tool for obtaining regularly

updated profiles of the entire inventory of Safety Bases for DOE hazard category 1, 2, and 3 nuclear facilities.

**Lessons Learned System** – This system supports and promotes the integration and sharing of information both internally and externally to DOE in order to prevent adverse operating incidents and improve operational safety awareness. Lessons learned are developed from significant and recurring events, operational emergencies and good work practices to meet the requirements of DOE O. 210.2A, *DOE Corporate Operating Experience Program*. Information is facilitated through the DOE Corporate Lessons Learned database which is designed to collect and share lessons learned from operating experiences throughout the DOE complex.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

Within existing budget and resource constraints, Department program managers and contractors continually work to apply the latest appropriate-level information technology (hardware and software) to reduce the contractor's information collection burden and improve the timeliness and usefulness of the management information being collected. This includes automation of previously manual processes, where appropriate. As resources allow, the Department is in the process of updating some of these databases to incorporate more user-friendly capabilities and analysis techniques to enhance the knowledge that can be gained from the data collected.

**4. Describe efforts to identify duplication.**

The collection in this package are applicable to contract management in DOE, collected by DOE to respond to interagency requests, or collected from business and citizens for national security purposes. Therefore, meaningful duplication of these collections in other agencies is unlikely.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This information collection will not have a significant economic impact on small businesses or small entities. The impact of the collection of information from small business is considered in the development of the contract requirements and documents and is minimized to the extent permitted by applicable statutory requirements and other legal and management constraints.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the collection is not conducted for the safety and health information or events concerning DOE employees, the public, environment, and DOE facilities, then, the injury or accident rates may increase due to lack of reporting. Lack of reporting provides insufficient information for trending and root cause analyses, therefore, recurrence will occur. As a result, the Federal safety and health programs and policies may not be effective if the information collection (reporting) is not conducted.

The frequency of collection is dictated by sound management practice, external laws and regulations, requirements of interagency reports, and Departmental orders and requirements. When any of these conditions change to permit reduction of the frequency of information collections, the reduction is made and the contract documents are changed accordingly.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collections contained in the package are consistent with Title 5 Code of Federal Regulations and OMB guidelines.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on October 21, 2015, volume 80, number

203, page 63752. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There is no remuneration given for submission of any of the information other than the fact that the expense of responding is treated as an allowable cost for contractors.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The sensitivity of information provided by respondents is assured by the Department's practices in accordance with the following statute, regulation, and policies.

- Privacy Act of 1974, as amended
- DOE Order 206.1, *Department of Energy Privacy Program*, 1/16/09
- DOE Order 205.1B, *Department of Energy Cyber Security Program*, 5/16/11
- DOE Order 200.2, *Information Collection Management Program*, 10/11/06
- DOE Order 231.1B, *Environment, Safety, and Health Reporting*, 06/27/11
- DOE Order 414.1D, *Quality Assurance*, 4/25/11
- DOE O. 210.2A, *DOE Corporate Operating Experience Program*, 4/8/11
- DOE O 232.2 Admin Chg 1, *Occurrence Reporting and Processing of Operations Information*, 3/12/14

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information., the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection **does not** collect information pertaining to sexual behavior, attitudes, and religious beliefs.

Collections that involve questions of a sensitive, personal, or private nature, including Personally Identifiable Information (PII) are protected from disclosure under Departmental directives.

Personally Identifiable Information (PII) Directives/Guidance:

- In accordance with the Privacy Act, DOE has established requirements for the protection of PII with DOE Order 206.1, DOE Privacy Program; and the DOE 205.1B, Department of Energy Cyber Security Program
- Privacy Act of 1974, as amended at Title 5 USC 552a, Section 208 of the E-Government Act of 2002

- DOE employees are made aware of their responsibilities to protect PII through the mandatory DOE Privacy Awareness Training: The Privacy Act and Safeguarding Personally Identifiable Information (PII).
- Federal Register Notice, January 9, 2009, Privacy Act of 1974, Publication of Privacy Act Systems of Records; Notice/Vol. 74, No. 6

The following data sets have PII and a recent Privacy Impact Assessment, however there is no SORN for these data sets as the information cannot be retrieved or sorted by personal identifier.

- CAIRS is a database used to collect and analyze DOE and DOE contractor reports of injuries, illnesses, and other accidents that occur during DOE operations and contains information from reporting contractors and subcontractors. PII No SORN.
- ORPS permits timely notification to the DOE complex of events that could adversely affect public or DOE worker health and safety, the environment, or operations of DOE facilities. No PII. No SORN
- NTS is a web-based system used by DOE contractors to voluntarily report nuclear and worker safety and health regulatory noncompliances to DOE. No PII No SORN
- REMS is a database of occupational radiation exposures for all monitored DOE employees, contractors, subcontractors and members of the public. The Rule 10 CFR 835.702 (a) and (b), *Occupational Radiation Program*, requires Annual Individual Radiation Exposure Records to be recorded, and reported to the Radiation Exposure Monitoring System Repository. PII No SORN
- The Annual Fire Protection Summary Application contains information from reporting contractors and subcontractors for an Annual Fire Protection Program Summary. No PII No SORN
- Safety Basis Information System was created to meet the requirement in 10 CFR 830, *Nuclear Safety Management*, which requires contractors and operators of DOE hazard category 1, 2, and 3 nuclear facilities to develop and maintain a Safety Basis for each facility and to perform work in accordance with that Safety Basis. It also provides DOE line managers with a tool for obtaining regularly updated profiles of the entire inventory of Safety Bases for DOE hazard category 1, 2, and 3 nuclear facilities. No PII No SORN
- Lessons Learned System supports and promotes the integration and sharing of information both internally and externally, to DOE, in order to prevent adverse operating incidents and improve operational safety awareness. No PII No SORN

**12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.**

The estimated burden hours are the sum of the burden reported by Departmental elements and field organizations as compiled from their respective contractors or estimated by expert personnel familiar with these collections. The attached spreadsheet provides detail information for each collection. The consolidated annual burden hours of this package is 41,733 hours and the total annual responses are 79,634.

**13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

The estimated annualized contractor cost to the Department for the data is based on \$120 per hour for respondents. The standard cost for federal employees is based on the General Services Administration (GSA) formula for determination of government paperwork and report costs, which is based on an estimate of \$45.54 per hour (2015 GS-13, Step 10 Hourly Basic Rate), with an additional 28% for employee fringe benefits and an additional 30% overhead cost. This federal employee salary is rounded to \$76 per hour. It is assumed that the record keeping burden is 0.25 hour per response. The estimated annualized cost to the contractor/public respondents for the data in this package is based on an assumed standard cost of \$120.00 per hour. Based on this hourly cost and the estimated burden hours of 41,733, the cost estimate total annual cost burden to respondents is \$5,007,960 per year. This standard cost was provided by the Business Council on the Reduction of Paperwork based on industry experience.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated annualized cost to the Federal government is an assumed standard cost of \$76 per hour for federal employees. The standard cost for federal employees is based on the General Services Administration (GSA) formula for determination of government paperwork and report costs, which is based on an estimate of \$45.54 per hour (2015 GS-13, Step 10 Hourly Basic Rate), with an additional 28% for employee fringe benefits and an additional 30% overhead cost. This federal employee salary is rounded to \$76 per hour. It is assumed that the record keeping burden is 0.25 hour per response.

- Government cost, at \$76/burden hour: \$1,513,046
- Estimated annualized Federal IT system cost (collection instruments are combined under one IT contract (including equipment, software, hardware, programming, and estimated annual updates): \$794,380.

Total estimated annualized cost for this package: \$2,307,426

**15. Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.**

We have determined that a burden hour adjustment of 41,733 hours should be made as follows: The attached spreadsheet provides detail information for each collection. The

consolidated annual burden of this package is 41,733 hours which represents a decrease of 3,127 hours.

Current OMB Burden Hours Inventory 44,860

OMB Burden Hour Reduction

- CAIRS: The decrease in burden hours is due primarily to a decrease in the number of respondents as a result of fewer injuries and illness occurring during this period. (100 hours decrease)
- ORPS: The FY 2012 amount of time to complete a response was inaccurately reported. Increase from FY 2012 due to accounting for total average time to complete an ORPS Report to be an average of 8 hours (not 2.5 hours as predicted in FY 2012). (4640 hours increase)
- NTS: No Change in annual burden hours but the number of respondents has decreased although the time it takes to complete these reports has taken longer. These changes are off-setting and results in no change to the total annual burden hours.
- REMS: DOE's mission of environmental remediation activities have progressed and/or have completed. Due to these changes, less individuals are monitored and reported. (7411 hours decrease)
- Fire Protection: No Changes
- Safety Basis: Based on enhancements to this system, the amount of time required for reporting was dramatically reduced. (256 hours decrease)
- Lessons Learned System: No change. 0

<b>TOTALS 1910-0300</b>	<b>Burden Hrs</b>	<b>41,733</b>
	<b>Respondents/Responses</b>	<b>1004/79,634</b>

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

This package contains no collections whose results will be published for statistical use.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

The Department is not seeking approval to not display the expiration date for OMB approval of the information collections contained in this package.



**18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

The Department of Energy is not requesting any exceptions to the certification statement provided in Item 19 of OMB Form 83-I.